Member of the public 101
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), pertain to the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning some 448 square kilometres of marine environment north-west of Islay and west of Colonsay. This location lies around 21 kilometres from Iona and is proximate to the islands and coastal communities of the southern Hebrides.

I request that this letter be recognised as a formal objection, that I be duly registered as an objector, and that I receive notification of the decision regarding these applications.

The objections detailed herein are grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing such proposals. It is imperative to note that the onus of proof lies squarely with the applicant. The applicant must provide sufficient evidence to satisfy all applicable tests and requirements. Objectors bear no responsibility to substantiate the contrary. Upon careful evaluation of the information submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications ought to be refused consent for the reasons elaborated in the subsequent sections.

1.1.1 Legislative and Policy Framework

The proposal fails to comply with the mandatory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects must be identified, assessed, and reported prior to any determination. This fundamental procedural omission undermines the statutory process and precludes a lawful decision-making framework.

Furthermore, the proposal does not satisfy the Habitats Regulations' requirement to assess effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance and the presence of evidential deficiencies and omissions constitute direct conflicts with the legal and policy framework. Such failures weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is not a discretionary matter but a clear legal requirement, and the absence of any substantive evidence showing that these interests have been properly assessed or integrated into the planning decision framework constitutes a fundamental procedural deficiency. Unlike scenarios where mitigation measures or

compensatory provisions might offset adverse impacts, no such measures have been presented or evidenced here to address the statutory duty under the Act. Consequently, the proposal stands in stark contrast to the legislative intent and fails to meet the threshold of lawful and policy-compliant decision-making.

Furthermore, the lack of demonstrated compliance with the Islands (Scotland) Act 2018, coupled with the evident omissions and deficiencies in addressing the interests of island communities, directly conflicts with the applicable legal and policy framework. As established by the approved evidence, where such compliance is not shown, these failures must weigh decisively against the granting of consent. The proposal's disregard for this statutory requirement undermines the integrity of the planning process and the protection afforded to island communities by the Act. In the absence of any evidence to the contrary, the proposal cannot be considered lawful or appropriate, and the planning authority is compelled to refuse consent on this basis alone.

There remains significant uncertainty as to whether the applicant has fulfilled the essential evidential burden required to demonstrate compliance with all relevant legal and policy requirements. It is a fundamental principle that the applicant must provide robust, objective, and proportionate evidence to show that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the submitted evidence fails to meet that standard.

The applicant has not demonstrated compliance in a manner that dispels doubt or addresses identified deficiencies. Where evidence is lacking or reveals omissions and conflicts with the legal and policy framework, such shortcomings must weigh decisively against the granting of consent. The absence of conclusive proof that all statutory and policy obligations have been met means the application cannot be considered compliant with the established legal and planning regime.

Accordingly, the application should be refused on the basis that the applicant has not discharged the responsibility to demonstrate full compliance with the relevant statutory duties and planning policies. Without such demonstration, the proposal remains contrary to the requirements governing lawful and sustainable development.

1.1.2 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. While NPF4 Policy 11 endorses such development, this support is explicitly conditional upon adherence to its impact provisions, including Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) addressing impacts on landscape, seascape, and other receptors. The proposal does not satisfy these criteria and consequently conflicts with the policy's requirements.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, a matter of considerable weight in the planning balance. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved,

nor that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments submitted fail to confirm that the necessary environmental protections can be achieved. Taken together, these shortcomings establish a clear conflict with NPF4 Policy 11's impact tests, indicating that the proposal should not attract policy support.

The proposal must be assessed in the context of the National Planning Framework 4 (NPF4), which sets out a comprehensive suite of policies designed to protect nationally significant environmental and cultural assets. Policy 11 should be read alongside other critical provisions, including Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Furthermore, Policy 7 addresses the protection of historic assets, with particular emphasis on scheduled monuments under Policy 7(h), as well as the settings of such heritage assets under Policies 7(c) and 7(d). Additionally, Policy 3 imposes stringent requirements to conserve and enhance biodiversity. These interconnected policies collectively establish a robust framework to ensure that development proposals do not detract from the integrity or significance of these designated assets.

In light of these policy requirements, it is evident that the proposal fails to comply with multiple relevant provisions within NPF4. The evidence demonstrates that the development would result in significant adverse effects on nationally designated landscapes and seascapes, thereby undermining the protective intent of Policies 4(c) and 4(d). Moreover, the applicant has not satisfactorily demonstrated that the cultural significance of scheduled monuments, including their settings, would be preserved, contrary to the expectations of Policy 7 and its sub-parts. The safeguarding of island communities, a matter implicitly connected to the overall environmental and cultural context, has also not been assured. Finally, the ecological assessments submitted do not establish that the stringent ecological tests set out under Policy 3 can be met. Collectively, these shortcomings confirm that the proposal conflicts with the comprehensive policy framework intended to protect nationally important landscapes, heritage assets, and biodiversity under NPF4.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These effects are material to the land-based environment and directly conflict with the policies designed to protect these valued attributes. As such, the proposal's quantified detrimental influence on these elements cannot be overlooked or mitigated within the existing planning framework.

Given these findings, it is clear that the proposal is inconsistent with the relevant development plan framework. The Local Development Plan 2 explicitly seeks to preserve the character and integrity of the area's landscape and heritage assets, which the proposal would compromise. Furthermore, this inconsistency extends to the National Planning Framework 4 when considered in its entirety, as the applicant has failed to demonstrate compliance or provide evidence to the contrary.

In conclusion, the proposal is fundamentally at odds with the established terrestrial development plan policies and the overarching national framework. This conflict

undermines the rationale for granting consent and strongly supports refusal. The adverse effects on landscape, heritage, and community interests weigh decisively against the proposal, and it should therefore be rejected in accordance with the statutory development plan and national planning policy.

1.1.3 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, an independent Evidence Note, which rigorously analyses the applicant's Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of the receptor's sensitivity or the extent of visibility. This pattern is corroborated by the applicant's own documents, which acknowledge the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area over 30 kilometres distant concludes that, due to viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types.

This implicit distance-based moderation of magnitude has significant implications for the reliability of the assessment outcomes. By systematically reducing the estimated magnitude of effects at distances where the most sensitive designated landscapes are situated, the methodology effectively understates the potential impacts. Consequently, the protective tests applied within the assessment are based on these diminished inputs, leading to conclusions that do not accurately reflect the true scale of effects that the Scottish Ministers are being asked to consent. In this regard, the methodology undermines the robustness and transparency of the environmental assessment, raising substantial concerns about the validity of its findings and the adequacy of protections afforded to sensitive landscapes.

The applicant's submission follows NatureScot's visualisation guidance, which itself recognises inherent constraints in the visual evidence provided. Specifically, the guidance notes that printed visualisations cannot fully replicate the scale perceived by a viewer on site. Furthermore, wireline drawings, which are included within the same panoramic views as the photographs, share these limitations. They function as technical renderings embedded within the visualisation rather than serving as independent tools to correct or enhance the photographic representation. This indicates that while the visual materials offer useful illustrative support, they must be interpreted with caution due to their inability to capture the true spatial experience and scale as encountered in the field. Consequently, reliance on these visualisations alone may not provide a comprehensive understanding of the potential visual impacts, underscoring the need for supplementary assessment methods or site visits to accurately inform decision-making.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The

proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

Beyond the temporal scope of the 35 years, it is also crucial to acknowledge that policy considerations do not treat this operational life as a limit on harm. The decision to grant consent for this development effectively constitutes a determination that the seascape is suitable for wind farm use, accepting the associated changes to its character. Therefore, even if mitigation could reduce some adverse effects, the permanent introduction of lighting remains a key factor in altering the night-time environment. In conclusion, the unavoidable lighting effects represent a material and lasting impact on the seascape character that must be carefully weighed in the planning balance.

The proposal engages multiple key policies, including NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which are designed to safeguard nationally important landscapes and seascapes. Despite acknowledging certain effects, the applicant has failed to demonstrate that its conclusions regarding the scale of these impacts align with the methodology it employed. This raises significant concerns about the reliability of the assessment presented.

Furthermore, the absence of clear evidence showing compliance with the relevant policies undermines confidence that the proposal adequately protects the designated landscape and seascape interests. The failure to substantiate the scale of effects contradicts the requirements of policies explicitly aimed at preserving the character and integrity of nationally important areas. This shortfall is material to the decision-making process.

In conclusion, the proposal does not meet the requirements of the relevant planning policies intended to safeguard landscape and seascape interests. Without demonstrable compliance and consistent assessment methodology, the proposal cannot be supported in its current form. It is therefore recommended that permission be withheld.

1.1.4 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate that the integrity of setting for historic assets has been properly evaluated, undermining confidence in its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland’s established methodology—which mandates an evaluation of whether changes to setting affect its contribution to cultural significance and whether setting integrity is maintained—the assessment relies predominantly on descriptions of visual change rather than the required evaluative analysis. A Methodological Audit, conducted using the applicant’s own Appendix 14.3, reveals that while heritage attributes are identified and factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation are discussed, the

critical step of assessing the integrity of setting in accordance with the accepted methodology is absent. This omission means that the conclusion asserting adequate retention of setting integrity is unsupported by the necessary methodological rigor, calling into question the reliability of the applicant's heritage impact findings.

The practical consequence of relying solely on fixed viewpoints to assess heritage impacts is a significant underrepresentation of the cultural significance of the affected assets. The applicant's baseline acknowledges that this significance arises from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape, where the interrelationships between monuments, spirituality, and the surrounding landscape and seascape are essential. These attributes are inherently dynamic and cannot be fully appreciated from static observation points.

Historic Environment Scotland's consultation responses, as recorded within the application documents, underscore this concern by requesting additional viewpoints to capture the broader cultural landscape comprehensively. This request highlights the necessity of a more nuanced assessment approach that embraces the experiential nature of the heritage assets, ensuring that the full range of their values is properly represented in the evaluation process.

Consequently, the assessment as submitted does not adequately reflect the baseline qualities or the cultural significance of the heritage assets as experienced in situ. To address this deficiency, it is imperative that a more holistic methodology be employed, incorporating movement and spatial relationships to avoid overlooking key experiential aspects that contribute materially to the heritage value. Without this, the appraisal risks undervaluing the assets and overlooking potential adverse impacts.

The practical consequence of the deficiencies in the landscape assessment is that the heritage impact conclusions lack reliability. Specifically, the heritage conclusions are contingent upon the landscape assessment; therefore, any understatement of landscape effects directly leads to a corresponding understatement in the heritage impacts derived from them. This dependency means that the credibility of the heritage assessment is fundamentally compromised by the initial shortcomings in evaluating the landscape effects.

The application falls short in providing adequate mitigation measures to safeguard the cultural significance of internationally and nationally important heritage assets, as required by relevant planning policies. Specifically, it fails to comply with the stringent provisions of NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the protection of their settings. Additionally, it does not meet the requirements set out in GEN 6 and the detailed guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. Without a robust and demonstrable mitigation strategy, the proposed development cannot be considered to adequately protect these heritage assets or their surroundings.

Furthermore, the applicant has not supplied Scottish Ministers with the necessary assessment to confirm that the cultural significance of these heritage assets and their settings will indeed be preserved. This omission means that the decision-

makers lack critical information required to evaluate the impact of the proposal on heritage values fully. Consequently, the application fails to satisfy the essential policy test for heritage protection, undermining its acceptability within the planning framework. In light of these shortcomings, the proposal should not be supported.

1.1.5 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence is fundamentally motivated by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the primary attractions drawing visitors to the area, forming the cornerstone of the local economy.

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The applicant's failure to assess the habitability of the affected islands has practical consequences for understanding and mitigating impacts on island communities. Although their consultants acknowledged habitability as a potentially significant pathway of effect, no place-based assessment was conducted for these islands. Instead, the socio-economic assessment in Chapter 18 focuses on regional analysis and detailed examination of port communities, concluding—without specific evidence—that island communities are of low sensitivity to tourism effects. This approach overlooks the unique nature of small island economies, which are not average regional economies but are heavily reliant on sectors vulnerable to changes in visitor appeal. Consequently, dependence on increasing visitor numbers intensifies their sensitivity rather than diminishing it. Therefore, the conclusion of low sensitivity lacks empirical support and rests on an unsubstantiated assumption rather than robust place-based analysis.

There remains significant uncertainty regarding the proposal's compliance with the statutory and policy requirements designed to protect island communities. The National Marine Plan, specifically GEN 19 and paragraph 4.81, alongside NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, establish a clear expectation that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. These provisions explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process. The absence of sound socio-economic data and the lack of a precautionary approach call into question the reliability of the proposal's assessment in this regard.

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that

the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.6 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, indicating a site of high ecological value. Additionally, the surrounding waters serve as a habitat for diverse species including seabirds, marine mammals, and basking sharks. This evidence underscores the presence of sensitive and protected species within and around the proposed development site.

Introducing large-scale construction, operational, and decommissioning activities into such an ecologically important environment over several decades raises significant concerns. The scale and duration of these activities have the potential to cause substantial adverse environmental effects, threatening the integrity of the Priority Marine Features and the habitats of the protected species identified. Careful consideration of these factors is essential to fully assess the environmental implications of the proposal.

The submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan represents a practical acknowledgement by the applicant that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. These documents are typically prepared to address situations where an adverse effect on the integrity of a protected site cannot be ruled out, indicating that the applicant has anticipated potential ecological impacts that require mitigation under the relevant derogation provisions.

Moreover, the inclusion of these documents as part of the application is a noteworthy aspect, as it reflects the applicant's understanding that the Scottish Ministers may reach a different conclusion regarding the presence or extent of adverse effects. This approach underscores the precautionary nature of the application process in relation to protected sites and suggests that the applicant is seeking to ensure that appropriate measures are considered to compensate for any potential harm. Nevertheless, the ultimate determination of whether these measures are adequate remains with the decision-making authority.

The applicant’s evidence correctly highlights the stringent requirements set out under the Habitats Regulations, which stipulate that consent for developments affecting protected sites may only be granted if it is clearly ascertained that the proposal will not adversely affect the integrity of the site. This threshold is deliberately high, allowing consent only where no reasonable scientific doubt remains. It is important to note that this places the evidential burden firmly on the applicant, who must provide robust demonstration that the statutory tests are satisfied.

Moreover, reliance solely on mitigation, compensation measures, or future monitoring is insufficient to meet the legal standard. These measures can support a case but cannot independently establish that the proposal will not have an adverse effect. This interpretation is consistent with the requirements of the Habitats Regulations and is reinforced by relevant policy frameworks including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, they ensure that developments are subject to rigorous scrutiny before consent is granted.

While it is acknowledged that development can bring benefits, these must be balanced against the imperative to protect designated habitats. The high evidential standard ensures that environmental integrity is maintained and that statutory obligations are upheld. Therefore, any assessment of the proposal must carefully consider whether the applicant's evidence convincingly dispels reasonable scientific doubt regarding adverse effects before permission is granted.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed, as it does not adequately safeguard internationally important ecological features. A detailed review of the submitted evidence, including the applicant's own derogation documents, reveals a lack of sufficient certainty that the legal protections for habitats and species of international significance will be upheld. This shortfall undermines the applicant's case for granting consent, as the statutory requirements designed to prevent adverse impacts on these protected features remain unmet. Consequently, the application fails to satisfy the necessary legal standards, and consent should be withheld accordingly.

1.1.7 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is presently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to subsequent applications. These elements are essential for the operation of the wind farm, yet their effects are excluded from the current assessment. Consequently, the cumulative impacts of the entire project are never evaluated together. This fragmented approach directly contradicts the legal principle established in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than segmented into smaller parts whose individual effects may seem less significant. By postponing the consideration of vital components until after the principal decision, the current process undermines comprehensive evaluation and risks overlooking significant environmental and planning impacts.

The cumulative impact assessment presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment (EIA). As established, the underlying evaluations of landscape, heritage, and socio-economic effects have been shown to understate the true scale of impacts. Consequently, the baseline from which the cumulative effects are measured is inherently reduced, reflecting an incomplete or diminished understanding of the existing environmental and social context.

This flawed baseline directly compromises the reliability of the cumulative assessment. When the combined effects of the current proposal are considered alongside other existing, consented, and foreseeable developments, the aggregated impacts are likewise underestimated. Therefore, the cumulative assessment fails to provide a robust or accurate account of the true scale of combined effects, undermining its utility for informed decision-making and potentially leading to inadequate mitigation or planning responses.

The assessment finds that the proposal does not comply with key planning policies and environmental regulations concerning project splitting and the evaluation of cumulative effects. Specifically, it fails to meet the standards set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, the requirements of the Environmental Impact Assessment Regulations have not been satisfactorily addressed, resulting in an incomplete appraisal of the environmental implications.

It is evident that the applicant has not demonstrated a reliable identification and assessment of the cumulative and in-combination effects of the proposal. In particular, there is a lack of clarity regarding the overall impact of the project as a whole, with deferred works not having been adequately considered within the environmental evaluation. This omission undermines the integrity of the assessment and leaves a significant gap in understanding the full consequences of the development.

In conclusion, given these shortcomings, it is essential that the decision-making process explicitly addresses the treatment of the deferred works and ensures a comprehensive evaluation of cumulative effects is conducted. Without this, the proposal remains inconsistent with the relevant policy and regulatory framework, and approval would be premature. It is therefore requested that these matters be fully resolved before any determination is made.

1.1.8 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, an uncertainty that fundamentally challenges the legitimacy of the applicant’s case. The applicant requests that Scottish Ministers place significant weight on this process, yet the quality of public engagement throughout both the plan and site-selection stages has been demonstrably deficient. These shortcomings have persisted into the application stage itself, which is extensive and complex, comprising many thousands of pages of technical material. Crucially, the consultation period has coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is severely limited. This situation contrasts sharply with the applicant’s position, having had years to prepare and substantial professional and financial resources at its disposal.

The National Marine Plan, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by decisions of this scale must be afforded a realistic opportunity to engage. Regrettably, the conditions under which affected communities have been expected

to respond fall short of these established standards. This shortfall undermines the fairness and inclusiveness that are essential to legitimate decision-making processes. It is imperative that Scottish Ministers recognise this deficiency and take it fully into account when considering the representations made.

In light of these concerns, it is clear that the consultation process has not met the requisite standards for effective public participation. This failure has compromised the integrity of the site-selection process and, by extension, the application as a whole. Therefore, the weight afforded to the site-selection process should be carefully re-evaluated, with full acknowledgement of the limitations imposed on affected communities throughout the consultation period.

The Environmental Impact Assessment (EIA) submitted as part of this application constitutes the primary evidential foundation upon which the Scottish Ministers must base their determination. However, it is imperative to note that the critical consideration is not the extent or breadth of the EIA but rather its sufficiency in enabling a fully informed decision. Within the range of topics examined, the application identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. Notably, the landscape assessment presents conclusions that adhere to a distance-based pattern, yet this pattern is not supported by the methodology explicitly set out within the same assessment. Similarly, the heritage assessment does not adequately demonstrate that it has applied its own prescribed integrity test, thereby undermining the reliability of its findings. Furthermore, the socio-economic assessment lacks a focused, place-based analysis of the islands likely to be affected, which is a critical omission given the localised nature of socio-economic impacts in such contexts.

Moreover, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals is problematic. Such dependencies do not absolve the requirement, as stipulated by the EIA Regulations, that likely significant effects must be clearly understood prior to the determination of the application. The Scottish Ministers are obliged to make decisions based on the evidence before them at the time of determination, rather than on the presumption that outstanding issues will be adequately resolved at a later stage. In this case, the applicant has not demonstrated that the environmental information currently submitted meets the requisite standards of adequacy. Consequently, the information provided is insufficient to support a properly informed decision by the Scottish Ministers.

1.1.9 Effects on Local Area

The applicant's assessment identifies Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly considers Islay through the perspective of its potential role as a direct project location, rather than as an affected island community in its own right. This approach overlooks the fact that Islay's Atlantic-facing communities confront the nearest edge of a substantial 448 square kilometre development area. Despite this proximity, the assessment fails to provide any place-based evaluation of the development's effects on Islay's setting, economy, or community life. This omission undermines the reliability of the environmental and

heritage impact evaluation as it neglects the lived experience and socio-economic dynamics of these communities directly adjacent to the project.

For Colonsay and Oronsay, the situation is similarly inadequately addressed. The seaward outlook, which fundamentally shapes daily life on these islands, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan. This indicates an explicit recognition within the application that harm to the internationally protected seabird population of these cliffs cannot be excluded. Additionally, Oronsay Priory, a scheduled monument of national importance, lies within this community's area. The deficiencies previously identified in the heritage assessment apply with equal force to the treatment of the Priory's open maritime setting. Collectively, these factors illustrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall robustness of the environmental and heritage impact evaluation.

The applicant's assessment of visual and community impacts on Iona significantly underestimates their scale and importance, particularly when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development site, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon over a distance of around 21 kilometres, resulting in a moderate and significant overall effect. The West Coast of Iona shares this high sensitivity and widespread visibility, with the applicant conceding significant effects for residents and visitors, including at Dùn Ì, the island's highest point. However, these conclusions do not fully reflect the magnitude of visual intrusion, as demonstrated by the fact that the largest turbines would exceed the height of Ben Hynish on Tiree—visible from Iona at 33 kilometres—by approximately 194 metres, while situated at roughly two-thirds of that distance. This comparison highlights the disproportionate scale of the turbines in the visual field, which the applicant's assessment fails to adequately acknowledge.

Moreover, the applicant's evaluation neglects critical cultural and social dimensions that exacerbate the impact on Iona's community and heritage. Iona's monastic landscape, encompassing internationally significant sites such as the Abbey, the Nunnery, and the high crosses, derives its value from pilgrimage, arrival by sea, and movement through the landscape—elements central to its heritage significance as identified in the baseline study. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing, the applicant did not provide visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Community consultation further reveals profound opposition, with 92 per cent of households objecting to the proposal, yet the applicant's own consultants admit that habitability, a critical pathway of potential effect, was never assessed. Taken together, these omissions and underestimations compromise the accuracy and robustness of the environmental and social impact evaluation, warranting a more thorough and sensitive appraisal before any determination is made.

While the applicant acknowledges significant effects on certain areas such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort, their assessment relies heavily on distance-based mitigation assumptions. For example, the Wilderness and Gribun Rocks coastal area is deemed to experience only small scale change due to its viewing distance exceeding 30 kilometres. This approach overlooks the fact that the Ross of Mull South coastal area, assessed as having High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude, despite the applicant's acceptance of significant impacts on key community points.

Similarly, across Mull, significant effects are admitted on Core Paths and within Local Landscape Areas including Central, South and West Mull. The Loch na Keal National Scenic Area, notable for its High sensitivity extending from 21 to 33 kilometres, is nonetheless assigned no greater than Medium magnitude. Such assessments appear inconsistent, particularly given the importance of these landscapes to local communities and the visitor experience, which the applicant recognises but does not fully translate into higher impact ratings.

Moreover, the applicant's evaluation does not sufficiently account for the economic and community implications for Mull's west-facing tourism sector. This includes wildlife boat operators and accommodation providers whose livelihoods depend on the largely unspoiled Atlantic seascape. These communities, integral to the area's character and economy, have not been subject to detailed place-based assessment, leaving a significant gap in understanding the full consequences of the proposed development on these sensitive coastal landscapes and their dependent populations.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, and attempts to evaluate the potential effects of the proposed development on their qualities. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the early stages of regeneration, with a small population whose recovery relies heavily on the integrity of its natural setting and unspoilt seascape. However, the applicant's assessment does not provide a specific evaluation of the effects on Ulva's landscape or community, despite the island sharing fully in the impacts on the designated area.

Regarding Staffa, although located approximately 35 kilometres from the development site—beyond the 30-kilometre radius recommended by NatureScot for assessment of National Scenic Area qualities—the applicant acknowledges the panoramic maritime qualities of the island but concludes that the scale of change would be small and the effect not significant. This conclusion appears to downplay the importance of Staffa's celebrated status as one of Europe's most renowned small islands.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated

roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

In summary, while the applicant's assessment acknowledges the presence of these important designated landscapes and their varying sensitivities, it appears to underestimate or omit detailed consideration of significant effects, particularly with regard to Ulva's vulnerable island community and the cultural and natural qualities of the more distant but highly valued islands such as Staffa and Jura. This raises concerns that the full extent of potential impacts on these landscapes and communities has not been adequately addressed, thereby undermining the protection of their distinctive natural and cultural characteristics.

In comparing the applicant's assessment with established standards of landscape impact mitigation, it becomes apparent that the evaluation of effects on Tiree's landscape character is substantially underestimated. The report assigns a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at an approximate distance of 35 kilometres. This disparity suggests an insufficient recognition of the landscape's vulnerability, particularly given the scale and prominence of the proposed turbines.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. The island's character is intrinsically linked to its open oceanic horizon and the dominance of sea and sky. The introduction of turbines up to 335 metres tall would introduce unprecedented vertical elements into this seascape, fundamentally altering the visual experience. Such a significant alteration to a sensitive receptor's setting cannot be accurately captured by a Low magnitude of change, indicating that the assessment's conclusions lack reliability.

Given the sensitive and distinctive nature of Tiree's landscape, the applicant's evaluation fails to account adequately for the scale of visual intrusion presented by the proposed development. A more rigorous and proportionate assessment is required to reflect the true magnitude of change and its implications for the island's landscape character. Without this, the evaluation remains incomplete and does not provide a sound basis for informed planning decisions.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the proposed development area, resulting in an incomplete evaluation of potential impacts. This omission carries practical consequences for those communities whose well-being and local economies depend on the seascape, as their concerns remain unaddressed and their interests inadequately represented in the planning process.

Notably, the community-owned island of Gigha, a nationally recognised symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced community and economy of Gigha have not been examined in the applicant's assessment, despite the likely sensitivity of this receptor to changes in seascape character and visual amenity. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward

panoramas are precisely the kind of receptors affected by the distance-based visual impact moderation that this objection highlights, yet they have not been properly accounted for.

Further, the chain of communities along the west coast of Kintyre, whose character and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters, share a comparable vulnerability. The Treshnish Isles and other small islands and mainland coasts with views towards the development area are similarly positioned. The exclusion of these receptors from the assessment undermines the comprehensiveness of the applicant's evaluation and risks overlooking adverse effects on the social and economic fabric of these interconnected communities. For these reasons, the assessment must be revisited to include a thorough appraisal of impacts on all relevant mainland and island receptors.

The applicant's assessment systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors situated beyond approximately 20 kilometres, resulting in an underestimation of significant effects. This methodological approach is evident in the treatment of numerous locations where the environmental impact is diminished in the analysis solely due to their distance from the development, despite the sensitivity of the receptors involved.

Such a distance-based discounting fails to acknowledge the genuine and potentially substantial impacts on these distant communities. The consequence is a lack of place-based assessment for those who live with the effects, which undermines the integrity and comprehensiveness of the environmental impact assessment. By not fully recognising the scale and significance of effects beyond the arbitrary 20-kilometre threshold, the assessment does not provide a reliable basis for decision-making.

In conclusion, the reliance on systematic moderation and discounting beyond 20 kilometres effectively marginalises the experiences of sensitive receptors and leads to an incomplete understanding of the development's true environmental consequences. For the assessment to be robust and credible, it must incorporate a more nuanced and thorough evaluation of effects regardless of distance, thereby ensuring that all affected communities are properly considered.

1.1.10 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and cultural heritage of the area. However, published reviews of the applicant's documents reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While the impacts on island communities have been identified, they remain unassessed. Additionally, the ecological criteria stipulated have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently under consideration by the Scottish Ministers.

Given these shortcomings, it is urged that consent for the MachairWind Offshore Wind Farm be refused, along with the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, it is recommended that the determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also sought that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 102
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, submitted by MachairWind Limited (ScottishPower Renewables), comprising applications 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. I request that this objection be duly recorded, that I be registered as an objector, and that I receive notification of the final determination on these applications.

The project under consideration seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines. Each turbine would reach a maximum blade tip height of 335 metres. The proposed development is situated within a designated Windfarm Development Area extending over approximately 448 square kilometres of marine environment to the north-west of Islay and west of Colonsay. This location lies roughly 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities of the southern Hebrides.

My objection is grounded in planning and environmental considerations evaluated against the applicable statutory and policy framework governing the determination of these applications. It is important to emphasise that the evidential burden rests entirely on the applicant to demonstrate, with adequate and compelling evidence, that all relevant planning and licensing tests are fulfilled. Objectors, by contrast, have no obligation to establish the contrary. Upon careful scrutiny of the submissions, it is evident that the applicant has failed to satisfy this burden, and accordingly, consent ought to be refused.

1.1.11 Legislative and Policy Framework

The marine licence application must be refused as it fails to demonstrate compliance with the statutory requirements under Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Authorisation decisions are legally mandated to accord with the National Marine Plan unless other relevant considerations dictate otherwise. This application does not meet that threshold.

Specifically, the application neglects to satisfy the General Policies integral to the statutory assessment process. These include GEN 4 concerning Co-existence, GEN 6 and paragraphs 4.22 to 4.23 addressing the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 requiring Sound Evidence, and GEN 21 with paragraph 4.85 on Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a fundamental deficiency.

Moreover, the evidence explicitly identifies omissions and conflicts with the applicable legal and policy framework. Such shortcomings are material and weigh decisively against the granting of consent. The application’s failure to provide sound evidence and adequately address cumulative impacts, historic environment

considerations, and natural heritage protections undermines the statutory assessment process.

In conclusion, the marine licence application does not comply with the Marine (Scotland) Act 2010 or the National Marine Plan policies. The identified deficiencies and conflicts necessitate refusal of the licence.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), notably Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The application has not provided sufficient evidence to show that it meets the standards set out in these policies, and no adequate mitigation measures have been presented to address the identified impacts on these critical areas.

Specifically, the evidence indicates deficiencies and omissions in the proposal's approach to protecting biodiversity and natural places, as required by Policies 3 and 4. There is a lack of clear demonstration that the development will avoid or adequately mitigate harm to habitats and species, nor that it will preserve the integrity of natural landscapes. Similarly, the proposal does not satisfactorily address the requirements of Policy 7 concerning historic assets and places, failing to ensure that designated and non-designated heritage assets will be conserved or enhanced in accordance with statutory and policy obligations.

Furthermore, the application does not comply with Policy 11 on energy, as it does not provide convincing evidence that energy considerations have been integrated in a manner consistent with the framework's objectives. Given these unresolved conflicts with the applicable legal and policy framework, and the absence of demonstrated compliance or effective mitigation, these matters weigh against the granting of consent for the proposal. The application, therefore, should be refused on the basis of its failure to meet the requirements of National Planning Framework 4.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these fundamental legal requirements. There is a clear failure to provide an adequate environmental impact assessment that fully identifies and evaluates the significant environmental effects as required by the regulations. Similarly, the necessary habitats regulations assessment has not been satisfactorily undertaken, leaving the potential impacts on European protected sites unassessed in accordance with the statutory framework.

Given these deficiencies, omissions, and the absence of demonstrable compliance with the applicable legal and policy framework, the proposal fundamentally conflicts

with the statutory requirements governing environmental and habitats assessments. The failure to meet these essential procedural and evidential standards is not a minor or technical shortcoming but a substantive legal defect that weighs decisively against the granting of consent. The absence of a robust and compliant environmental impact assessment and habitats regulations assessment undermines the lawful basis for determination and compels refusal of the application in accordance with the established legal principles and policy mandates.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement obliges decision-makers to explicitly address the specific needs and circumstances of island communities during the planning process. The absence of clear evidence demonstrating such consideration means the proposal does not comply with the legal framework established by the Act.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in addressing island community interests, these shortcomings must be regarded as material factors weighing against the granting of consent. In this case, the failure to adequately assess and incorporate the interests of island communities constitutes a significant conflict with the applicable legal and policy framework, thereby undermining the legitimacy of the proposal's approval.

The applicant has failed to provide the robust, objective, and proportionate evidence necessary to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure to meet the evidential burden is a fundamental deficiency that cannot be overlooked.

It is the applicant's responsibility to prove that every applicable legal and policy framework has been satisfied. In this case, the submitted evidence does not establish such compliance. Instead, it reveals omissions and conflicts with the statutory and policy requirements that govern the proposal. Where compliance is not demonstrated, or where deficiencies and omissions exist, these shortcomings must weigh decisively against the granting of planning consent.

Given the absence of adequate evidence confirming adherence to all legal and policy obligations, the proposal does not meet the necessary standards for lawful and policy-compliant development. Consequently, the application should be refused on the basis that the applicant has not fulfilled the essential evidential burden required to justify approval.

1.1.12 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, resulting in a practical consequence that it cannot be supported under the policy's framework for renewable energy development. While NPF4 Policy 11 endorses renewable energy projects, this endorsement is conditional upon satisfying specific impact criteria, particularly those addressing effects on communities, landscapes, seascapes, and other receptors. The proposal's inability to meet these criteria

means it falls short of the policy's intended balance between development and environmental and cultural protection.

Specifically, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns under Policy 11(c) relating to impacts on communities and their heritage. The lack of evidence to safeguard island communities further exacerbates this conflict, indicating that the proposal does not adequately address the social and cultural dimensions integral to the policy's impact criteria.

Additionally, the ecological assessments provided fail to show that the necessary tests can be met, undermining the proposal's compliance with the relevant environmental protections embedded within Policy 11. Taken together, these deficiencies demonstrate a clear conflict with NPF4 Policy 11, thereby undermining the policy's support for the proposed renewable energy development. On this basis, the proposal should not be granted planning permission.

The proposal must be assessed against a range of National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7, including section 7(h) concerning scheduled monuments, and sections 7(c) and 7(d) relating to the settings of historic assets, impose stringent protections. Policy 3 further requires that biodiversity considerations are integral to decision-making.

Upon detailed examination, the proposal conflicts with these policies in several respects. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their special qualities for which they are recognised. The application has failed to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns about the integrity of these heritage assets. Moreover, the proposal does not sufficiently ensure the safeguarding of island communities, which are a protected element under the relevant policies. Finally, the ecological assessments submitted do not convincingly meet the necessary tests to confirm that biodiversity impacts would be adequately managed or mitigated.

In conclusion, the evidence indicates that the proposal does not comply with multiple relevant NPF4 policies intended to protect designated assets, thereby raising substantial policy conflicts that weigh against its approval.

The applicant's evidence acknowledges that, in relation to terrestrial effects, the proposal conflicts with the Argyll and Bute Local Development Plan 2. Specifically, it would adversely impact the landscape, heritage, and community interests that the plan seeks to protect. This conflict extends to the wider development plan framework and National Planning Framework 4 when considered in their entirety. The applicant has not provided sufficient demonstration to overcome these conflicts. Consequently, the proposal is inconsistent with the relevant terrestrial development plan policies.

1.1.13 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a clear distance threshold beyond which major effects are deemed to cease, yet an independent Evidence Note reveals a consistent pattern indicating that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change. This finding persists regardless of the receptor's sensitivity or the extent of visibility. The applicant's own documentation corroborates the influence of distance on these judgements: for instance, an assessment of a coastal area more than 30 kilometres away concludes that the scale of change is small due to the viewing distance. Furthermore, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in the application of protective tests to understated inputs. Consequently, the conclusions drawn do not provide a reliable depiction of the effects that the Scottish Ministers are being asked to consider for consent.

When considering the effectiveness of mitigation measures, it is essential to recognise that the visualisation materials provided offer only a limited representation of the proposed development's impact. The applicant's adherence to NatureScot's visualisation guidance is noted; however, this guidance itself acknowledges inherent constraints. Printed visualisations cannot fully convey the true scale experienced by a viewer on site, which may lead to an underestimation of visual effects compared to real-world perception.

Furthermore, the wireline drawings, presented alongside photographic panoramas, do not serve as an independent corrective tool. Rather, they are technical renderings embedded within the same visual framework and thus share the limitations of the photographic base. This means that the visual evidence cannot be relied upon to provide a wholly accurate or comprehensive understanding of the development's visual impact, underscoring the need for caution when interpreting these materials in the planning assessment.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the intended 35-year operational lifespan. This change is significant as it transforms an existing natural and unlit maritime environment into one marked by artificial lighting, with clear implications for the visual qualities and experiential value of the seascape after dark. Furthermore, the applicant's assessment rightly notes that the 35-year operational period does not diminish the policy significance of this harm. Granting consent for the development effectively signals that this particular seascape is considered appropriate for wind farm use despite the adverse impact on its night-time character. This carries considerable weight in planning terms, as it establishes a precedent regarding the acceptability of lighting effects on seascape character within the policy framework. Consequently, the introduction of permanent aviation and navigation lighting must be carefully weighed against policy objectives aimed at

conserving the natural qualities of the seascape, recognising that harm arising from such lighting is enduring and materially alters the night-time environment.

The proposal fails to comply with essential planning policies designed to safeguard nationally important landscapes and seascapes, which has significant implications for the integrity of these protected environments. The applicant has not adequately demonstrated that the scale of the identified effects aligns with its own assessment methodology, casting doubt on the reliability of the conclusions presented.

This lack of consistency is particularly critical given the clear policy framework outlined in the National Planning Framework 4 (NPF4) and the National Marine Plan. Specifically, the proposal engages NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which establish stringent requirements for protecting landscape and seascape interests at a national level.

In light of these considerations, the proposal does not meet the necessary policy tests and should be reconsidered to ensure compliance with the statutory protections for these valued environments. Without demonstrable adherence to the relevant policies, approval would undermine established planning objectives and the long-term preservation of nationally significant landscape and seascape assets.

1.1.14 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment of heritage impacts adheres to Historic Environment Scotland’s established methodology, which rightly distinguishes between visual change and adverse impact on the setting of historic assets. This methodology emphasises the need to evaluate whether alterations affect the contribution that setting makes to cultural significance and to determine if the integrity of that setting is preserved. It explicitly recognises that visual alterations alone should not be equated with harm, thereby providing a nuanced framework for assessing heritage impacts.

However, a Methodological Audit, conducted independently from the applicant’s Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes and describes visual changes such as visibility, distance, and screening, it fails to demonstrate the critical evaluative step required by the adopted methodology. The assessment does not show how the integrity of setting has been properly appraised against the criteria it accepts, merely concluding that it is adequately retained without substantiating this judgment. This omission undermines the reliability of the assessment’s conclusions regarding heritage impacts and calls into question the robustness of the applicant’s overall evaluation.

While the applicant’s assessment acknowledges the cultural significance of the affected heritage assets, identifying key qualities such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape, it appears that the mitigation measures proposed may not fully address these dynamic experiential aspects. The applicant’s baseline explicitly recognises that these values are experienced through movement rather than from fixed viewpoints, underscoring the importance of a broader cultural landscape perspective. Furthermore, Historic

Environment Scotland, in their consultation responses recorded within the application, requested additional viewpoints to ensure that these wider qualities would be properly represented. This suggests that the current assessment and proposed mitigation may be insufficient in capturing the full extent of the heritage assets' cultural significance. Therefore, while some mitigation is offered, it falls short of encompassing the holistic and experiential qualities fundamental to the heritage assets, warranting further consideration to adequately protect their cultural value.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions, which rely heavily on that assessment, are consequently undermined. Where landscape effects have been understated, as previously detailed, this understatement directly carries over to the heritage conclusions, casting doubt on their accuracy and reliability.

This interdependence means that any failure to fully acknowledge the extent of landscape effects results in a corresponding failure to properly evaluate the heritage impacts. Therefore, the credibility of the heritage assessment is compromised by the shortcomings of the landscape assessment upon which it depends, indicating a need for a more robust and thorough evaluation of landscape effects to support sound heritage conclusions.

The application fails to provide the necessary assurances that the cultural significance of internationally and nationally important heritage assets and their settings will be adequately protected. This shortcoming has a practical consequence in that it undermines the acceptability of the proposal, as the Scottish Ministers do not have before them the requisite assessment to support a conclusion that these heritage interests would be safeguarded.

This failure engages key policy provisions, notably NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to their setting. Additionally, the application must be considered in light of GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which impose clear expectations for the protection of heritage assets and their contexts.

Given that the applicant has not demonstrated compliance with these established policy requirements, the proposal cannot be considered to meet the standards necessary for approval. Consequently, the application should be regarded as deficient in its protection of heritage assets and, therefore, unacceptable in its current form.

1.1.15 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address some impacts of the development, they are insufficient when weighed against the fundamental reliance of the island communities on the very qualities the proposal threatens. The applicant's own baseline assessments confirm that visitors are drawn to these islands specifically for their landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the cornerstone of the local economy, underpinning visitor expenditure that sustains essential services and supports population retention. Any alteration to these defining characteristics would therefore

directly undermine the economic viability of these communities and jeopardise their long-term social sustainability.

The practical consequence of the applicant's inadequate socio-economic assessment methodology is that the potential adverse impacts on island communities affected by the proposal remain insufficiently understood and unmitigated. The applicant's own consultants acknowledged habitability as a potentially significant pathway through which the development could affect these island communities. Yet, no direct assessment of the habitability of the islands likely to be impacted was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly at a regional scale, concentrating detailed analysis on port communities while neglecting a comparable place-based evaluation of the island communities themselves. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This conclusion is fundamentally flawed. Small island economies cannot be equated with regional averages; their economic structures are heavily concentrated in sectors most vulnerable to changes in the qualities that attract visitors. The islands' reliance on increasing visitor numbers does not mitigate their sensitivity to potential adverse effects; on the contrary, it intensifies their dependence on the very attributes that the proposal risks undermining. Drawing a conclusion of low sensitivity without conducting a thorough, place-specific analysis is therefore not supported by evidence but represents an unsubstantiated assumption.

In summary, the applicant's socio-economic assessment fails to provide a robust or credible understanding of the impacts on island communities. This gap undermines the reliability of the conclusions reached and leaves the risks to these vulnerable communities insufficiently addressed.

The proposal fails to meet essential planning and statutory requirements concerning island communities, resulting in an inadequate foundation for decision-making. Without sound socio-economic evidence and a precautionary approach where such evidence is absent, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, the assessment is fundamentally flawed. This deficiency undermines compliance with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which obligate meaningful engagement and careful consideration of island communities' interests throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny but did not conduct the necessary assessment to understand the potential impacts on these communities. This omission means the proposal cannot be demonstrated to be compatible with sustaining island communities, thereby failing to discharge the statutory duties owed to them. The absence of appropriate evaluation and engagement represents a significant shortcoming in the planning submission.

In light of these considerations, the proposal should not be approved as it does not satisfy the legal and policy framework designed to protect island communities. It is imperative that any development likely to affect these communities undertakes thorough assessment and meaningful engagement to ensure compliance with the relevant statutory duties and national planning policies.

1.1.16 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population of the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively excluded. This submission underscores the applicant's recognition of potential adverse impacts arising from the proposal. Moreover, the inclusion of these documents is a significant feature of the application itself, indicating that, according to the applicant's own reasoning, the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. While the provision of derogation and compensation plans demonstrates a proactive approach to addressing environmental concerns, it also highlights inherent uncertainties about the proposal's impact on the protected guillemot population, warranting careful and thorough consideration.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The applicant's own derogation documents, as submitted, reveal a significant shortfall in demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. The evidence presented fails to provide the requisite degree of certainty that these legal protections can be met, thereby casting doubt on the robustness of the applicant's position.

This failure to satisfy the statutory criteria fundamentally undermines the justification for granting consent. Without clear assurance that the internationally protected ecological features will be adequately protected, the application cannot be considered compliant with the relevant legal requirements, and as such, should not be approved.

1.1.17 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed as it fragments essential components, notably deferring the export cable corridor and onshore transmission works to separate applications. This segmentation precludes a comprehensive evaluation of the project's cumulative effects, as these critical elements are not considered alongside the wind farm itself. Without assessing these interconnected parts together, it is impossible to fully understand the overall environmental and operational impacts, undermining effective mitigation and regulatory oversight.

This method conflicts with established legal principles, particularly the precedent set in Raeshaw Farms, which mandates that a project must be evaluated in its entirety rather than divided into smaller parts whose individual impacts may seem less significant. By salami-slicing the project, the assessment bypasses a holistic review, potentially allowing adverse effects to be overlooked until after the principal decision has been made. Such an approach is procedurally unsound and risks non-compliance with statutory requirements for comprehensive project appraisal.

The cumulative impact assessments rely fundamentally on the findings of the underlying Environmental Impact Assessment. As noted in the submitted evidence, where the baseline evaluations for landscape, heritage, and socio-economic factors understate the extent of effects, the cumulative assessment consequently adopts this diminished baseline. This approach results in an understatement of the combined impacts when considering this proposal alongside other existing, consented, and foreseeable developments. Therefore, the reliability of the cumulative impact assessment is compromised, leading to an overall underestimation of the true scale of combined effects.

While mitigation measures have been proposed, they fail to address a fundamental procedural deficiency concerning project splitting and the assessment of cumulative effects. The applicant has not satisfactorily demonstrated compliance with GEN 21 and paragraph 4.85 of the National Marine Plan, nor with NPF4 Policy 11(e), all of which explicitly require comprehensive evaluation of cumulative and in-combination effects. Furthermore, the requirements of the Environmental Impact Assessment Regulations in relation to project splitting have not been met. This omission means that the cumulative impacts of the proposal and the overall effects of the project, including any deferred works, have not been reliably identified or assessed. It is

therefore essential that the decision-making process explicitly considers the treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.18 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation in that process is directly material to the decision. However, there have been clear deficiencies in participation not only at the plan and site-selection stages but persisting into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities. During this time, residents are continuously engaged throughout the visitor season, and access to specialist advice is limited. This contrasts sharply with the applicant's position, having had years to prepare its case with substantial professional and financial resources.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by such decisions have a realistic opportunity to engage meaningfully. The conditions under which the affected communities have been expected to respond fall short of this standard. This undermines the legitimacy of the consultation process and, by extension, the site-selection process itself. It is therefore imperative that Ministers bear these shortcomings firmly in mind when assessing the representations submitted in response to the application.

The Environmental Impact Assessment (EIA) submitted with the application serves as the primary evidential basis for the Scottish Ministers' determination. However, the critical consideration is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate them adequately. For instance, the landscape assessment presents outcomes that follow a distance-based pattern not supported by its stated methodology. Similarly, the heritage assessment does not convincingly apply its own integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. These shortcomings undermine the reliability of the conclusions drawn within the EIA.

Moreover, the application partially relies on future assessments, post-consent plans, monitoring arrangements, and additional approvals to address outstanding environmental matters. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. The Scottish Ministers are required to base their decision solely on the evidence before them, not on an expectation that unresolved issues will be satisfactorily addressed later. The applicant has therefore not demonstrated that the environmental information provided is adequate for the Scottish Ministers to make an informed decision on this application.

1.1.19 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it appears to underestimate the scale and significance of these effects compared to established mitigation standards. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with extensive visibility and a large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from around 21 kilometres away, a substantial visual intrusion. Similarly, the West Coast of Iona, including Dùn Ì—the island's highest point—is recognised as highly sensitive, and the applicant concedes significant effects for both residents and visitors in these areas.

The cultural and heritage impacts are also more profound than the applicant's evaluation suggests. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, holds international significance, particularly linked to pilgrimage and arrival by sea. Although Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, the applicant has not provided visualisations from crucial locations such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines a full understanding of the development's impact on the heritage setting, which is integral to the island's identity and visitor experience.

Community concerns further underscore the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, reflecting widespread local opposition. Despite this, the applicant's consultants have not evaluated habitability impacts, even though their own analysis identifies this as a potential pathway of effect. The scale of the turbines' visibility is emphasised by comparison with the familiar landmark of Ben Hynish on Tiree, which is 141 metres high and visible from Iona at around 33 kilometres; the proposed turbines would exceed this height by approximately 194 metres, at a closer distance of roughly two-thirds of Ben Hynish's range. Taken

together, these considerations suggest that the applicant's environmental and social impact evaluation for Iona lacks the necessary depth and accuracy.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, and attributes these effects a Medium magnitude. Specifically, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment fails to fully recognise the significant effects on designated landscapes and island communities, thereby risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is entirely subject to the same impacts identified for that landscape. As a small, re-establishing community reliant on its unspoilt seascape and setting for regeneration, the absence of any specific assessment for Ulva is a notable omission. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies some 35 kilometres from the development area—beyond the 30-kilometre assessment limit advised by NatureScot. Despite acknowledging its panoramic maritime qualities, the applicant concludes effects there would be small and not significant, a judgement that understates potential impacts. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic character, is assessed at a distance of around 28 to 32 kilometres with an assumed Medium to Low magnitude of effect based on distance and retained landforms; this moderation contrasts with the importance of its designation. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment approach. Collectively, these considerations suggest the applicant's evaluation underestimates or omits significant effects, undermining the proper protection of these sensitive seaboard landscapes and vulnerable island communities.

The applicant's assessment concludes that the South Tiree coastal area, located approximately 35 kilometres from the proposed development, experiences only a Low magnitude of change despite being classified as having High sensitivity. This practical underestimation risks leading to inadequate mitigation measures and an overall unreliable evaluation of the environmental effects, given the significance of the receptor in question.

Tiree's landscape character is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky, with its highest point, Ben Hynish, reaching merely 141 metres. The introduction of turbines up to 335 metres tall would represent unprecedented vertical elements within this open oceanic horizon. Such a substantial visual intrusion cannot reasonably be categorised as Low magnitude, as it fails to reflect the island's distinctive and sensitive seascape. Consequently, the assessment's conclusion exemplifies a severe understatement of the true impact on Tiree's landscape character.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. Notably, Gigha, a community-owned island renowned as a national symbol of island regeneration following its purchase by residents, faces the development from the east; yet, the impacts on its delicate community balance and economy remain unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach is incorrectly applied, thereby undermining an accurate assessment. Furthermore, the chain of communities along the west coast of Kintyre derives its character and visitor economy from the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts overlooking the development area share this position of sensitivity. In neglecting these viewpoints and their associated economic and community significance, the applicant's assessment lacks the necessary comprehensiveness and fails to address key receptors integral to the seascape's social and economic fabric.

The applicant's assessment methodology reveals a consistent pattern whereby sensitive receptors located beyond approximately 20 kilometres are subject to a systematic moderation of the magnitude of change, resulting in a discounted evaluation of the effects experienced. This approach effectively diminishes the significance of impacts on these distant communities, as the assessment does not incorporate any place-based analysis tailored to their specific circumstances. The consequence is an environmental impact assessment that overlooks the nuanced and potentially substantial effects on populations residing beyond this arbitrary distance threshold.

Such a distance-based criterion undermines the integrity of the environmental impact assessment by failing to adequately recognise and address the experiences of highly sensitive receptors at greater distances. The absence of place-specific evaluation for these communities means that their exposure to environmental changes is neither fully understood nor properly mitigated. This methodological shortcoming calls into

question the comprehensiveness and reliability of the applicant's assessment, suggesting that significant effects may be systematically underestimated and discounted, thereby weakening the overall robustness of the environmental evaluation.

1.1.20 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, independent scrutiny of the submitted documentation reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, while the proposal identifies effects on the island communities concerned, it does not provide any substantive evaluation or assessment of these impacts. The ecological criteria required by law have also not been demonstrated as achievable. Additionally, the submission is incomplete in that only a portion of the project has been presented for ministerial consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider an alternative course, I request that they require the provision of further environmental information alongside improved visual representations of the project. Moreover, any determination should be deferred until a public inquiry has been held, allowing for a thorough examination of the concerns raised in this objection. Regardless of the final decision, I also ask that the Ministers explicitly address and state their conclusions on the effects the development would have on cultural heritage and the impacted island communities within their reasoning.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 103
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386. These applications seek consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be officially recorded and that I be kept informed of the outcome of the decision-making process.

The proposed development involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would consist of between 91 and 144 wind turbines, each reaching up to 335 metres in height to blade tip. The site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment located north-west of Islay and west of Colonsay, positioned roughly 21 kilometres from Iona. The proximity of the proposal to these islands and the broader southern Hebrides coastal communities is a significant factor in the assessment.

In presenting my objection, I outline the planning and environmental grounds grounded in the statutory and policy frameworks relevant to these applications. It is imperative to note that the onus lies entirely with the applicant to satisfy all applicable tests and demonstrate compliance with the necessary criteria through adequate evidence. Objectors bear no obligation to prove any contrary position. Having considered the evidence and arguments put forward, it is clear that the applicant has not fulfilled this responsibility. Consequently, I contend that consent for the MachairWind Offshore Wind Farm should be refused.

1.1.21 Seascape, Landscape and Visual Effects

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes, resulting in unacceptable effects that have not been properly justified. Specifically, the impacts identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite these clear policy triggers, the applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed. This lack of methodological consistency undermines confidence in the conclusions presented. Moreover, there is no adequate demonstration that the proposal complies with the relevant policies protecting nationally important landscape and seascape interests. In light of these deficiencies, the proposal cannot be considered to meet the necessary policy standards and should therefore be refused.

1.1.22 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands’

economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

Any alterations to these defining characteristics would therefore have a profound impact, striking directly at the economic base upon which these communities depend. This, in turn, threatens the broader social sustainability of the islands by undermining essential services, diminishing population retention, and ultimately compromising their continuing viability. The proposal's potential to diminish the very qualities that attract visitors must be recognised as a fundamental risk to the long-term resilience of these island communities.

Uncertainty remains over the adequacy of the applicant's socio-economic assessment in addressing the specific impacts on island communities. While their consultants acknowledged habitability as a potentially significant pathway affecting these communities, no subsequent assessment of island habitability was undertaken. Instead, the socio-economic appraisal in Chapter 18 focuses predominantly on regional port communities, neglecting an equivalent place-based evaluation of the island populations directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects, a determination that lacks a robust evidential basis.

This approach overlooks the distinct nature of small island economies, which are not accurately represented by regional averages. Such economies are concentrated in sectors highly vulnerable to alterations in the qualities attracting visitors. Far from mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these at-risk qualities. Therefore, concluding low sensitivity without detailed, place-specific analysis is not supported by evidence but constitutes an unsubstantiated assumption. Given these methodological shortcomings, the applicant's socio-economic assessment fails to sufficiently understand or mitigate potential impacts on island communities.

1.1.23 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting important species such as seabirds, marine mammals, and basking sharks. This establishes the site's significant ecological value and sensitivity. The proposed development would involve construction, operation, and decommissioning activities on a very large scale and over several decades, thereby posing a considerable risk of adverse environmental effects. Given the recognised presence of protected species and habitats, the scale and duration of the project warrant thorough assessment and mitigation to prevent substantial harm to these vulnerable marine ecosystems.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The very act of submitting these documents is a noteworthy element of the application. It indicates

the applicant’s recognition that, notwithstanding their own assessment, the Scottish Ministers might reach a different conclusion regarding the potential for adverse effects. Therefore, while these submissions demonstrate the applicant’s intention to mitigate possible negative impacts through derogation and compensation measures, they also acknowledge uncertainty surrounding the assessment of harm to the protected site.

The practical consequence of the legal framework governing developments affecting protected habitats is that consent cannot be granted unless it is unequivocally demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement is absolute under the Habitats Regulations, which stipulate that no reasonable scientific doubt can remain regarding potential impacts. As such, the competent authority must be fully satisfied before consent is issued, reflecting the high evidential standard demanded by law.

This legal test is supported by key planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. These policies collectively reinforce the necessity for rigorous assessment and the precautionary approach embedded in the Habitats Regulations. They ensure that environmental protection is paramount in the decision-making process concerning developments potentially affecting protected habitats and species.

It follows that the responsibility to meet these stringent requirements lies entirely with the applicant. Demonstrations relying solely on mitigation measures, compensation schemes, or proposals for future monitoring are insufficient to satisfy the statutory tests. Only clear, definitive evidence that adverse effects will be avoided can lawfully justify consent. Without such evidence, consent must be refused to uphold the integrity of protected sites and comply with the comprehensive legal and policy framework.

The application fails to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by the applicant’s own derogation documents. These documents reveal significant uncertainty regarding the applicant's ability to meet the rigorous legal requirements intended to safeguard such ecological features. The lack of clear, conclusive evidence undermines confidence that the proposed development would not harm these protected environments.

Given the statutory framework’s stringent standards, which require certainty that no adverse effects will arise, the applicant’s failure to provide definitive proof is a critical shortcoming. The evidence submitted does not satisfy the tests, leaving unresolved questions about potential impacts and mitigation effectiveness. This gap in compliance is not a minor procedural issue but a fundamental flaw that goes to the heart of the application’s lawfulness and appropriateness.

In light of these points, the case for granting consent cannot be supported. The statutory tests exist to ensure the protection of internationally important ecological assets, and the applicant has not met these essential legal thresholds.

Consequently, the application should be refused to uphold the integrity of environmental safeguards enshrined in law.

1.1.24 Effects on Local Area

There is significant uncertainty surrounding the applicant's assessment of the direct impacts on Islay and Colonsay, which raises concerns about the overall reliability of the environmental and heritage impact evaluation. Despite Islay and Colonsay being the closest islands to the proposed development area—located immediately north-west of Islay and west of Colonsay—the application primarily considers Islay only as a potential project location. It fails to adequately assess Islay as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet no place-based assessment has been undertaken regarding the effects on their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook defining daily life faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, lying along Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This is the clearest admission within the application that harm to the internationally protected seabird population on these cliffs cannot be ruled out, underscoring the potential severity of environmental impacts that remain insufficiently addressed.

Moreover, Oronsay Priory, a scheduled monument of national importance, is situated within this community's area. The previously identified gaps in the heritage assessment apply with equal force to the evaluation of the Priory's open maritime setting. Taken together, these shortcomings demonstrate that the applicant's assessment does not comprehensively address the significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thus undermining confidence in the environmental and heritage impact evaluation presented.

The applicant's own Coastal Character assessment recognises that the Sound of Iona is of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The overall effect is classified as Moderate and Significant, impacting an area approximately 21 kilometres away, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. This demonstrates that the scale of visual impact is substantial and geographically extensive.

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay

at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment recognises the Ross of Mull South coastal area as having High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of effect. Significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—acknowledged as the community most directly impacted by visitor flows. Across Mull more broadly, significant effects are similarly recognised on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is classified as of High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the applicant attributes no greater than Medium magnitude of effect. The assessment's treatment of the Wilderness and Gribun Rocks coastal area, where viewing distances exceed 30 kilometres and the scale of change is judged small, exemplifies a reliance on distance-based reasoning that may understate the significance of impacts. Furthermore, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, all of which depend on the largely unspoilt Atlantic seascape that the development would industrialise. Taken together, these points suggest that the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area,

recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

The applicant's assessment acknowledges the South Tiree coastal area as possessing High sensitivity at an approximate distance of 35 kilometres from the proposed development, yet paradoxically attributes a Low magnitude of change to this receptor. This juxtaposition is critical because it directly informs the overall evaluation of landscape effects. The designation of High sensitivity reflects the acknowledged vulnerability and distinctive qualities of this part of Tiree's coastline, which underpins the landscape's character and the community's connection to place. However, the Low magnitude rating appears incongruous with the acknowledged sensitivity and the scale of the proposed turbines, suggesting a significant understatement in the assessment's appraisal of impact severity.

Tiree itself is characterised as an exceptionally low-lying island, with a landscape defined predominantly by the interplay of sea and sky, and the absence of substantial vertical features. The island's highest point, Ben Hynish, reaches only 141 metres, and the open oceanic horizon forms an integral aspect of its distinctive landscape character. The introduction of turbines up to 335 metres tall would represent unprecedented vertical structures within this seascape, dramatically altering the visual composition and experiential qualities of the area. Given such a profound potential change, the conclusion of Low magnitude for this receptor does not reliably reflect the true scale of impact. This discrepancy leads to an evaluation of effects on Tiree's sensitive and distinctive landscape character that is insufficiently robust, undermining confidence in the overall conclusions drawn in the assessment.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation has been applied in this objection,

calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant's assessment cannot be regarded as comprehensive or sufficiently robust.

The applicant's approach to environmental impact assessment employs a distance-based methodology that systematically moderates and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This method contrasts with a more thorough, place-based assessment that would address the specific conditions and vulnerabilities of each affected community. By applying a generalized mitigation threshold at this distance, the assessment effectively diminishes the acknowledged magnitude of change experienced by receptors further afield, potentially overlooking meaningful impacts that warrant detailed consideration and tailored mitigation measures.

Taken together, the evidence demonstrates a consistent pattern whereby highly sensitive receptors beyond the 20-kilometre limit receive only a moderated evaluation of effects, while the communities living within these areas are not the subject of any focused, locality-specific assessment. This systematic discounting undermines the integrity of the environmental impact assessment by failing to account adequately for the lived experience and environmental sensitivities of these distant but nonetheless affected populations. Such an approach risks underestimating significant adverse effects and weakens the overall robustness and credibility of the applicant's environmental evaluation.

1.1.25 Personal Observations

In addition to the planning matters above, I am personally concerned because: Iona is a sacred space even for people without faith, it is a clean air, beautiful scenery, quiet reflective place which needs preserving. The habitats are also important in land and marine.

1.1.26 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area in question. Moreover, independent analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the mandatory heritage assessment has not been undertaken, and although the effects on the island communities have been identified, they remain unassessed. Additionally, the proposal fails to satisfy the necessary ecological tests, and it is notable that only a portion of the project is currently subject to consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application. Should the Ministers decide against refusal, I request that they require the submission of further environmental information and enhanced visualisations. Furthermore, I recommend that determination of the applications be deferred until after a public inquiry, ensuring that the issues raised in this objection can be fully and properly scrutinised.

Regardless of the final decision, I also ask that the Ministers provide clear and explicit conclusions within their reasons, specifically addressing the impacts on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 104
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (operating as ScottishPower Renewables), seek authorisation for an offshore wind development with an anticipated capacity of approximately 2 gigawatts. The scheme envisages the erection of between 91 and 144 turbines, each with a maximum tip height of 335 metres, situated within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

I request that my objection be formally recorded, that I am registered as an objector, and that I receive notification of the final determination on these applications.

The following outlines the planning and environmental grounds for my objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the responsibility to satisfy the relevant statutory tests rests solely with the applicant, who must provide adequate and convincing evidence to justify consent. Objectors are not obligated to disprove the proposals. Upon careful consideration of the evidence presented, it is clear that the applicant has not fulfilled this burden. Consequently, the applications should be refused consent.

1.1.27 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Crucially, the applicant must also take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not establish that such reasonable mitigation measures have been identified or committed to, thereby falling short of the statutory requirement. This absence of demonstrated mitigation undermines the applicant’s compliance with the legal framework and fails to satisfy the necessary standard of care expected under Schedule 9.

Furthermore, the Scottish Ministers, in their determination of the application, are required to have regard to the same statutory duties. The evidence explicitly states that where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these matters weigh against the granting of consent. Given the clear deficiencies and omissions in addressing the statutory duties under Schedule 9, the application cannot be considered to meet the legal threshold for approval. The failure to properly

address these statutory obligations constitutes a significant procedural and substantive defect that must result in the refusal of consent.

The marine licence application under consideration is subject to determination pursuant to Part 4 of the Marine (Scotland) Act 2010. As stipulated by the statutory framework, the decision-making process must accord with the provisions of Scotland's National Marine Plan unless material considerations indicate otherwise. The National Marine Plan sets out a series of General Policies that are directly relevant to this proposal, including but not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 alongside paragraph 4.85 regarding Cumulative Impacts. Compliance with these policies is an integral component of the statutory assessment process for the marine licence application.

Upon examination of the application and supporting documentation, it is evident that compliance with the aforementioned policies has not been satisfactorily demonstrated. The evidence presented fails to address adequately the requirements set out in the National Marine Plan, resulting in identifiable deficiencies and omissions. These shortcomings undermine the statutory assessment and indicate conflicts with the applicable legal and policy framework. In particular, the absence of robust evidence to satisfy the standards of GEN 19 (Sound Evidence) and the failure to properly consider cumulative impacts as required by GEN 21 and paragraph 4.85 are significant procedural and substantive defects. Furthermore, the application does not sufficiently engage with the policies protecting the Historic Environment and Landscape and National Scenic Areas, as mandated by GEN 6, GEN 7, and their associated paragraphs, thereby neglecting critical statutory considerations.

Given these material deficiencies and the failure to demonstrate compliance with the relevant policies of the National Marine Plan, the application does not meet the statutory requirements for authorisation under the Marine (Scotland) Act 2010. In accordance with the established legal framework, where compliance is not demonstrated and conflicts with policy exist, these factors weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it fails to satisfy the statutory criteria and policy obligations governing marine developments in Scotland.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. The evidence confirms that this statutory obligation is not merely procedural but substantive, requiring a thorough and explicit assessment of how the proposal impacts island communities. The absence of such consideration in the application documentation constitutes a fundamental deficiency in the planning process.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and that the evidence identifies omissions and conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The failure to properly consider and weigh the

interests of island communities undermines the legality and soundness of the proposal's assessment, rendering the application unacceptable in planning terms. Consent should therefore be refused on this basis.

The practical consequence of the applicant's failure to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements is that the application cannot be properly determined in accordance with the law. The applicant bears the responsibility to prove that every applicable legal and policy framework has been satisfied, and this evidential burden is fundamental to the decision-making process.

In this case, the applicant has not fulfilled that burden. The evidence submitted does not adequately demonstrate compliance with the full range of statutory and policy obligations. Where such compliance has not been shown, or where the evidence reveals deficiencies, omissions, or conflicts with the legal and policy framework, these shortcomings must be given significant weight against the granting of consent. The absence of clear and convincing evidence undermines the legitimacy of the application and precludes a lawful approval.

Accordingly, the application should be refused on the basis that the applicant has not met the essential requirement to demonstrate compliance with all relevant legal and policy requirements. Without this demonstration, the proposal fails to satisfy the fundamental conditions necessary for lawful planning consent. The decision-maker must therefore reject the application in line with established legal and policy principles.

1.1.28 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that are designed to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, the proposal must be considered alongside Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3, which addresses biodiversity protection.

In the detailed assessment, it is evident that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. The evidence submitted also fails to show that the ecological tests required under the relevant policies can be met. Accordingly, the proposal conflicts with the comprehensive suite of policies intended to protect these nationally important assets, and therefore does not accord with the provisions of NPF4.

The applicant's evidence confirms that, in relation to land-based effects, the proposal conflicts with the terrestrial development plan framework, including the Argyll and

Bute Local Development Plan 2. Specifically, it is acknowledged that the development would adversely affect landscape character, heritage assets, and community interests that these policies are designed to protect. This recognition underscores the fundamental incompatibility of the proposal with the objectives and safeguards established within the local development plan.

Furthermore, this conflict extends to the broader planning policy context, as the proposal is also inconsistent with National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient demonstration to overcome these identified policy conflicts. Consequently, the proposal cannot be regarded as compliant with the relevant development plan framework, thereby undermining its acceptability within the established terrestrial planning policy regime.

1.1.29 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entirety of its 35-year operational life. This change would be readily apparent to observers and would mark a significant departure from the existing natural darkness of the maritime environment.

Importantly, the operational lifespan of the development does not mitigate the policy implications of this harm. Granting consent to this project would represent a clear policy decision that the affected seascape is deemed suitable for wind farm use, thereby endorsing the acceptability of such visual and lighting impacts in this location.

Given the lasting nature of these effects and their direct influence on the character of the night-time seascape, careful consideration must be given to whether the introduction of artificial lighting in this currently unlit marine setting is consistent with planning policies aimed at protecting seascape character. It is therefore essential that the significance of this impact is fully recognised in the decision-making process.

The proposal fails to demonstrate adequate mitigation in comparison to the requirements set out in relevant planning policies protecting landscape and seascape interests. The applicant has not shown that its assessment of the scale of the accepted effects aligns with its own methodology, thereby undermining the reliability of its conclusions. As a result, the proposal does not comply with National Planning Framework 4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), or GEN 7, nor does it meet the standards outlined in paragraph 4.28 of the National Marine Plan. This shortfall indicates a failure to safeguard nationally important landscapes and seascapes as mandated by these policies. Consequently, the proposal does not accord with the necessary policy framework and should not be supported.

1.1.30 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment follows Historic Environment Scotland’s established methodology for evaluating the effects of development on the setting of historic assets. This recognised approach, developed and refined in consultation with Historic Environment Scotland, mandates a specific evaluation of whether changes

to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is sufficiently preserved. Importantly, the methodology clarifies that visual change alone should not be automatically equated with an adverse impact, thereby requiring a nuanced assessment beyond mere visibility or prominence.

However, a Methodological Audit conducted in support of community objections, relying exclusively on the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the applicant's report acknowledges key heritage attributes and describes visual changes in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not demonstrate how the integrity of setting has been evaluated in accordance with the prescribed methodology. The essential evaluative step—judging whether the integrity of setting is adequately retained—is absent from the examples examined by the Audit. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is undermined, as the required methodological rigor has not been fully applied.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, the relationships between monuments, spirituality, and the encompassing landscape and seascape, which are experienced dynamically rather than from fixed viewpoints. However, Historic Environment Scotland's consultation responses, as recorded within the application, highlight the need for additional viewpoints to adequately capture and represent these broader experiential and cultural landscape qualities. This indicates that the current assessment may not fully encompass the intangible and movement-based aspects integral to the heritage assets' significance, thereby necessitating a more comprehensive approach to ensure that the full cultural context is properly considered in the impact evaluation.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the accuracy and reliability of the heritage impact conclusions derived from it. The assessment of heritage impacts is not an isolated exercise; it is fundamentally dependent on the landscape analysis that precedes it. If the landscape effects are understated, as has been demonstrated, then the heritage conclusions that are built upon this flawed foundation must also be considered understated and potentially misleading. This interdependence means that deficiencies in the landscape assessment undermine the overall credibility of the heritage impact findings. Consequently, without a robust and accurate landscape assessment, the heritage conclusions cannot be relied upon to fully reflect the true extent of impacts, and this must be taken into account in the decision-making process.

The application falls short in providing adequate mitigation measures to safeguard the cultural significance of internationally and nationally important heritage assets, as required by relevant planning policies. Specifically, it fails to comply with the stringent provisions of NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the protection of their settings. Additionally, it does not meet the requirements set out in GEN 6 and the detailed guidance found in

paragraphs 4.22 to 4.23 of the National Marine Plan. Without a robust and demonstrable mitigation strategy, the proposed development cannot be considered to adequately protect these heritage assets or their surroundings.

Furthermore, the applicant has not supplied Scottish Ministers with the necessary assessment to confirm that the cultural significance of these heritage assets and their settings will indeed be preserved. This omission means that the decision-makers lack critical information required to evaluate the impact of the proposal on heritage values fully. Consequently, the application fails to satisfy the essential policy test for heritage protection, undermining its acceptability within the planning framework. In light of these shortcomings, the proposal should not be supported.

1.1.31 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a direct threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors who are drawn by the very qualities that the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these defining characteristics would immediately undermine the primary source of income for local residents and businesses.

The economic base of these island communities is intrinsically linked to the visitor experience shaped by their unique environment. A diminution of landscape or seascape quality, or a loss of cultural heritage and tranquillity, would have cascading effects not only on tourism revenues but also on the viability of essential services that sustain the resident population. Without these visitors, the local economies would contract significantly, threatening employment, local commerce, and the provision of public amenities.

Consequently, the proposal's impact extends beyond mere aesthetics or environmental change; it strikes at the heart of the islands' continuing viability. The populations of these communities depend on a stable economic foundation supported by tourism, which in turn depends on preserving the very qualities the development risks compromising. For these reasons, the proposal should be considered unsustainable in its current form, as it endangers the core attributes that attract visitors and thus the long-term survival of the island communities themselves.

There remains significant uncertainty regarding the adequacy of the applicant's socio-economic assessment, particularly in relation to island communities directly affected by the proposal. Notably, the applicant's own consultants identified habitability as a potentially significant pathway through which the development could impact these communities; yet, no specific assessment of the habitability of the islands in question was undertaken. Instead, Chapter 18 of the assessment considers socio-economic effects primarily at a regional scale, focusing in detail on port communities but omitting an equivalent, place-based analysis of the island populations facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism-related effects.

This conclusion is fundamentally flawed. Small island economies cannot be accurately represented by regional averages, as their economic structures are typically concentrated in sectors most vulnerable to alterations in the environmental qualities that attract visitors. Indeed, their reliance on increasing visitor numbers does not diminish their sensitivity; rather, it intensifies their dependence on the very attributes at potential risk from the proposal. Therefore, to assert low sensitivity in the absence of rigorous, island-specific analysis is not a conclusion grounded in evidence but an unsupported assumption. Given these deficiencies, the socio-economic assessment cannot be regarded as sufficient to understand or mitigate the proposal's impacts on island communities.

1.1.32 Ecology, Biodiversity and Habitats Regulations

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. The presence of these documents indicates a recognition that the proposed development has the potential to cause adverse effects on the integrity of this protected site, effects which cannot be definitively ruled out. The preparation and inclusion of such documents are a notable aspect of the application, reflecting the applicant's acknowledgment of potential environmental impacts that warrant mitigation or compensation measures.

These documents are conventionally prepared for circumstances where adverse effects on protected sites cannot be excluded and are intended to support derogation provisions under relevant conservation legislation. Importantly, the submission of these documents does not guarantee agreement from the determining authorities; indeed, the applicant concedes that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or significance of any adverse effects. This underscores the necessity for careful scrutiny of the evidence and proposed compensation measures to ensure the protection of the designated guillemot population and the integrity of the Special Protection Area.

The applicant must recognise that under the Habitats Regulations, consent for development affecting protected habitats can only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This standard is exacting, requiring that no reasonable scientific doubt remains. It is the applicant's responsibility to demonstrate this, and reliance solely on mitigation, compensation measures, or future monitoring does not satisfy the statutory tests. This legal framework is stringent and non-negotiable, ensuring the highest level of protection for designated sites.

This statutory requirement is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e) and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions establish a comprehensive policy context that upholds the rigorous protections of the Habitats Regulations. Any proposal must therefore be assessed with great care to ensure full compliance with both legal and policy standards before consent can be lawfully granted.

The evidence submitted by the applicant, including their own derogation documents, clearly indicates that they have not demonstrated compliance with the statutory tests required to protect internationally important habitats and species. This failure to satisfy the legal requirements undermines the justification for granting consent, as the necessary degree of certainty to safeguard these ecological features has not been established. Consequently, the application cannot be considered compliant with the statutory protections in place for internationally significant ecological assets.

1.1.33 Cumulative and In-Combination Effects

There is significant uncertainty regarding the adequacy of the current assessment approach, as only a portion of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot function—have been deferred to subsequent applications. Consequently, the environmental and planning effects of the entire project are never evaluated in a single, comprehensive process. Instead, key elements will be subject to separate consenting procedures only after the principal decision is made. This fragmented approach is inconsistent with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear diminished. Therefore, the current method is procedurally and legally flawed, as it prevents a holistic appraisal of the project's cumulative effects.

There remains significant uncertainty surrounding the reliability of the cumulative impact assessment, stemming primarily from the foundational baseline assessments upon which it is based. As the Environmental Impact Assessment's underlying evaluations of landscape, heritage, and socio-economic effects have been demonstrated to understate the true extent of impacts, it follows that the cumulative assessment is similarly compromised. This foundational weakness calls into question the accuracy of the combined effects presented, as they rely on an already diminished baseline that fails to capture the full scope of potential harm.

Consequently, the cumulative effects of this proposal, when considered alongside other existing, consented, and foreseeable developments, are likely to be understated. This underestimation risks leading decision-makers to an incomplete understanding of the overall impacts, undermining the robustness of the planning process. Given these concerns, it is clear that the cumulative impact assessment cannot be relied upon in its current form to support a fully informed and precautionary planning decision.

1.1.34 Public Engagement, Site Selection and Environmental Information

When comparing the mitigation measures proposed within the application, it becomes apparent that reliance on future assessments, post-consent plans, monitoring, and additional approvals is insufficient to meet the requirements of the Environmental Impact Assessment (EIA) Regulations. The Regulations mandate that likely significant effects must be fully understood prior to determination, not deferred for resolution at a later stage. This approach undermines the fundamental purpose of

the EIA as the principal evidential basis for the Scottish Ministers' decision-making process, as it leaves critical uncertainties unresolved at the point of consent.

Furthermore, a detailed examination of the environmental information reveals significant shortcomings that compromise its adequacy. The landscape assessment, for instance, reaches conclusions based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate proper application of its integrity test. The socio-economic assessment is deficient in that it lacks a place-based analysis of the affected islands, a vital component for understanding local impacts. Collectively, these deficiencies indicate that the application does not provide a sufficiently comprehensive or robust evidential foundation. Consequently, the Scottish Ministers cannot be satisfied that the environmental information before them is adequate to enable an informed decision in accordance with statutory requirements.

1.1.35 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay's Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of consequences for their local setting, economic activities, or community life. Similarly, Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's assessment of impacts on Iona substantially underestimates the scale and significance of visual, community, and heritage effects, thereby undermining the reliability of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The overall effect is classified as Moderate and Significant, with turbines visible across approximately 39 degrees of the horizon over a distance of about 21 kilometres, including from the ferry crossing between Fionnphort and Iona. The West Coast of Iona, similarly, is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors across much of the island, including at Dùn Ì, its highest point. These acknowledged sensitivities suggest that mitigation measures fall short of addressing the breadth and depth of visual impact.

Moreover, the assessment fails to fully consider Iona's internationally important monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, remains unfulfilled, with no visualisation provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Community concerns are also inadequately addressed; a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which was never assessed. The visual scale of the turbines can be contextualised by comparison to Ben Hynish on Tiree, which, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by some 194 metres at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's evaluation significantly underestimates the adverse effects on Iona, warranting a more rigorous and comprehensive appraisal.

The applicant's assessment fails to adequately recognise the significant visual, economic, and community impacts that the proposed development would impose on the coastal communities and landscapes of Mull and Ross of Mull. At the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, the applicant acknowledges significant effects at Erraid and on the Core Paths of the Ross. Crucially, Fionnphort—serving as the gateway to Iona and the principal embarkation point for visitors—is recognised as experiencing significant effects, yet no place-based assessment has been provided for this community that is directly dependent on visitor flows. Across Mull more broadly, the applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly assessed as of High sensitivity over distances ranging from 21 to 33 kilometres; however, the applicant attributes only a Medium magnitude of effect, thereby underestimating the visual impact. Furthermore, the approach to the Wilderness and Gribun Rocks coastal area exemplifies a reliance on distance-based reasoning: despite viewing distances exceeding 30 kilometres, the applicant judges the scale of change to be small, a conclusion that does not sufficiently account for the sensitivity of the landscape or the cumulative impact. The west-facing tourism economy of Mull, including its wildlife boat operations and accommodation providers in western townships, depends fundamentally on the unspoilt Atlantic seascape that the development would industrialise. Notably, none of these communities has been subjected to a place-specific assessment, leaving a significant gap in understanding the full extent of the adverse effects. In summary, the applicant's assessment inadequately addresses the scale and significance of impacts on designated landscapes and tourism-dependent communities in Mull and Ross of Mull, thereby underrepresenting the practical consequences for these sensitive coastal areas.

In comparing the applicant's assessment with established standards of landscape impact mitigation, it becomes apparent that the evaluation of effects on Tiree's landscape character is substantially underestimated. The report assigns a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at an approximate distance of 35 kilometres. This disparity suggests an insufficient

recognition of the landscape's vulnerability, particularly given the scale and prominence of the proposed turbines.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. The island's character is intrinsically linked to its open oceanic horizon and the dominance of sea and sky. The introduction of turbines up to 335 metres tall would introduce unprecedented vertical elements into this seascape, fundamentally altering the visual experience. Such a significant alteration to a sensitive receptor's setting cannot be accurately captured by a Low magnitude of change, indicating that the assessment's conclusions lack reliability.

Given the sensitive and distinctive nature of Tiree's landscape, the applicant's evaluation fails to account adequately for the scale of visual intrusion presented by the proposed development. A more rigorous and proportionate assessment is required to reflect the true magnitude of change and its implications for the island's landscape character. Without this, the evaluation remains incomplete and does not provide a sound basis for informed planning decisions.

The applicant's assessment applies distance-based mitigation measures that moderate the perceived effects of the development, yet this approach fails to account adequately for the seascape receptors with direct visual and economic connections to the site. For example, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors to the entire peninsula. These seaward panoramas are precisely the type of receptor where distance-based moderation is insufficient, as the significance of the views and their contribution to the visitor economy demand a more nuanced evaluation. Similarly, communities along the west coast of Kintyre, whose outlook and character are shaped by the open Atlantic seaboard facing Islay, Jura, and adjacent waters, rely heavily on these seascapes for their identity and tourism, yet their specific sensitivities have been overlooked.

Moreover, the omission extends to island communities such as Gigha, a community-owned island whose purchase by residents has become a national symbol of island regeneration. Gigha faces the development area directly from the east, and the potential effects on its delicate community structure and local economy have not been examined in the applicant's assessment. The Treshnish Isles and other small islands with views towards the proposed development share similar vulnerabilities that remain unassessed. By neglecting these mainland and island communities with direct visual exposure and economic reliance on the seascape, the applicant's assessment lacks comprehensiveness and fails to address significant adverse effects that are crucial to informed decision-making.

The environmental impact assessment submitted by the applicant employs a distance-based approach that systematically moderates the magnitude of change and discounts effects on highly sensitive receptors beyond approximately 20 kilometres. This methodology results in a significant underestimation of the true impacts experienced by these receptors. It is clear from the evidence that such an approach fails to adequately capture the extent and severity of effects at greater distances, thereby compromising the assessment's overall integrity.

Furthermore, the communities residing beyond this 20-kilometre threshold have been effectively excluded from any meaningful place-based assessment. This omission is of particular concern as it disregards the lived experiences and sensitivities of those populations who may be substantially affected. The absence of detailed, location-specific evaluation for these receptors undermines the comprehensiveness and robustness that is essential for a credible environmental impact appraisal.

In conclusion, the applicant's distance-based moderation and discounting approach beyond 20 kilometres cannot be accepted as a reliable or thorough method of assessment. To ensure the environmental impact assessment accurately reflects the full range of effects, a more rigorous, inclusive, and place-sensitive evaluation is necessary. Without such improvements, the current assessment remains fundamentally flawed and insufficiently protective of sensitive receptors situated beyond the arbitrary 20-kilometre boundary.

1.1.36 Personal Observations

Based on my own local knowledge, I also wish to highlight that: As someone with friends on some of the islands I know they consider this development an abomination!

1.1.37 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities of the coastal region. However, published analyses of the applicant's documents indicate that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and while the effects on the island communities affected by the development were identified, no formal evaluation of these impacts has ever been carried out. Furthermore, the ecological criteria integral to the proposal have not been demonstrated as achievable. It is also important to note that the submission before the Scottish Ministers only encompasses part of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers consider an alternative course, it is requested that additional environmental information and enhanced visual representations be sought. Moreover, it is recommended that the applications be determined only following a public inquiry, thereby allowing for thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and record their conclusions on the proposal's effects upon cultural heritage and the impacted island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 105
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, associated with application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the development of an offshore wind facility with a capacity of approximately 2 GW. The project envisions between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area encompassing around 448 square kilometres of marine space northwest of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded on planning and environmental considerations, assessed against the relevant statutory and policy frameworks governing such developments. It is important to recognise that the evidential burden lies firmly with the applicant, who must convincingly demonstrate compliance with all applicable tests and requirements. Opponents to the scheme, including myself, are not obliged to establish the contrary. Upon careful examination of the evidence presented, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

I request that this letter be formally registered as an objection and that I be informed of the final decision regarding these applications.

1.1.38 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure means that the proposal does not adequately address the essential legal requirements intended to safeguard these important environmental and cultural assets.

Furthermore, the applicant has not shown that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. The absence of such mitigation measures indicates a significant omission in the application, undermining the statutory framework’s purpose and the Scottish Ministers’ duty to have regard to these considerations when determining the application.

Given these deficiencies and the lack of demonstrated compliance with the statutory duties under Schedule 9, the application conflicts with the applicable legal and policy framework. As established, where such conflicts or omissions exist, they weigh decisively against the granting of consent. Therefore, the application should be refused on the basis that it does not meet the mandatory statutory requirements of the Electricity Act 1989.

The marine licence application is required to be determined under Part 4 of the Marine (Scotland) Act 2010, with authorisation decisions made in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan's General Policies of particular relevance to this proposal include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is a statutory requirement forming part of the assessment of the application.

The evidence before the determining authority does not demonstrate compliance with these statutory policies. There are identified deficiencies and omissions in the application's evidence base, which fail to adequately address the requirements of the National Marine Plan policies cited. In particular, the application lacks sufficient demonstration of co-existence measures, historic environment considerations, landscape and natural heritage protections, meaningful engagement, sound evidence, and cumulative impact assessments as mandated by the relevant policies.

Given these unresolved deficiencies and the absence of demonstrated compliance with the applicable legal and policy framework, the application conflicts with the statutory requirements under the Marine (Scotland) Act 2010 and the National Marine Plan. Such failures weigh decisively against the granting of consent for the marine licence. The application should therefore be refused on the grounds that it does not meet the necessary statutory and policy standards.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), notably Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The application has not provided sufficient evidence to show that it meets the standards set out in these policies, and no adequate mitigation measures have been presented to address the identified impacts on these critical areas.

Specifically, the evidence indicates deficiencies and omissions in the proposal's approach to protecting biodiversity and natural places, as required by Policies 3 and 4. There is a lack of clear demonstration that the development will avoid or adequately mitigate harm to habitats and species, nor that it will preserve the integrity of natural landscapes. Similarly, the proposal does not satisfactorily address the requirements of Policy 7 concerning historic assets and places, failing to ensure that designated and non-designated heritage assets will be conserved or enhanced in accordance with statutory and policy obligations.

Furthermore, the application does not comply with Policy 11 on energy, as it does not provide convincing evidence that energy considerations have been integrated in a manner consistent with the framework's objectives. Given these unresolved conflicts with the applicable legal and policy framework, and the absence of demonstrated compliance or effective mitigation, these matters weigh against the

granting of consent for the proposal. The application, therefore, should be refused on the basis of its failure to meet the requirements of National Planning Framework 4.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of a development must be identified, assessed, and reported prior to any determination. The submitted documentation does not adequately demonstrate that these requirements have been met, resulting in an incomplete environmental impact assessment. This procedural deficiency undermines the decision-making process by leaving the determining authority without a full understanding of the potential environmental consequences of the proposal, contrary to the legal framework established to ensure informed and responsible planning decisions.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a comprehensive habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly evaluated or mitigated. Given that compliance with these statutory tests has not been demonstrated, and considering the identified deficiencies and omissions in the environmental evidence, the proposal conflicts with the relevant legal and policy framework. As a result, these failures weigh decisively against the granting of consent for the development.

The applicant’s submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and afforded due weight in the decision-making process. The evidence from source S01 explicitly states this statutory obligation, establishing a clear legal framework within which proposals affecting island communities must be assessed. The absence of any substantive analysis or evidence within the application to show that these interests have been properly identified, evaluated, or balanced indicates a fundamental procedural deficiency. This omission undermines the integrity of the decision-making process and fails to meet the statutory standard set by the Islands (Scotland) Act 2018.

Furthermore, the failure to demonstrate compliance with this statutory duty, as highlighted in source S01, constitutes a significant deficiency and omission in the applicant’s evidence base. Where such compliance is not evidenced, or where the application conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The proposal’s disregard for the statutory requirement to consider and give due weight to island communities’ interests represents a material conflict with the Islands (Scotland) Act 2018 and relevant planning policy. Accordingly, this failure alone provides a compelling reason for refusal, as the proposal does not satisfy the legal tests necessary for lawful and proper consent.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This evidential burden is essential to satisfy every

applicable statutory duty, planning policy, and environmental assessment requirement. The absence of such comprehensive demonstration undermines the legitimacy of the application and precludes any assumption that the proposal aligns with the necessary frameworks.

Moreover, the evidence presented reveals clear deficiencies and omissions in addressing these statutory and policy obligations. Where compliance has not been conclusively shown, and conflicts with the legal and policy framework remain unaddressed, these shortcomings must weigh decisively against the granting of consent. The applicant's failure to discharge this burden renders the proposal non-compliant and unacceptable within the established planning and environmental governance regime.

1.1.39 Conflict with National Planning Framework 4 and the Development Plan

Although NPF4 Policy 11 supports renewable energy development, that support is expressly conditional on meeting the policy's impact criteria, including those relating to communities, landscapes, seascapes, and other receptors. In this case, the proposal fails to comply with these essential criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, thereby undermining their protection. Furthermore, there is no adequate demonstration that the cultural significance of scheduled monuments and their settings would be preserved. The proposal also does not show that island communities would be safeguarded from negative impacts. Finally, the ecological requirements set out in the policy have not been satisfactorily addressed or evidenced. Consequently, the proposal conflicts with NPF4 Policy 11 and cannot be supported under its provisions.

The practical consequence of the proposed development is that it would result in significant adverse effects on a range of nationally important designated assets, contravening several key policies within NPF4. Specifically, the proposal would undermine the qualities for which National Scenic Areas and other nationally important landscapes have been designated, as set out in Policy 4(c) and 4(d). This is compounded by the failure to demonstrate adequate protection for the cultural significance of scheduled monuments and their settings, contrary to the requirements of Policy 7, including Policy 7(h) and Policies 7(c) and 7(d). Furthermore, the proposal does not show how island communities would be safeguarded, nor does it meet the ecological criteria established under Policy 3 on biodiversity. These shortcomings collectively indicate a clear conflict with the intended protective framework of NPF4.

In analysing these policy conflicts, it is evident that the proposal falls short in addressing the full scope of the protections afforded to designated landscapes, heritage assets, and biodiversity. The evidence submitted does not satisfy the necessary tests to prevent significant adverse effects on nationally designated landscapes and seascapes. Likewise, there is an absence of convincing demonstration that the cultural and historic values of scheduled monuments and their settings would be preserved. The failure to confirm that island communities would be appropriately safeguarded further highlights the incompatibility of the proposal with the comprehensive policy approach required by NPF4. Given these

factors, the proposal cannot be considered compliant with multiple, interrelated policies designed to protect nationally important assets.

The proposal would result in adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. This direct conflict with the policies designed to protect these aspects demonstrates that the development is inconsistent with the relevant land-based planning framework. In addition, the proposal fails to align with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to overcome these conflicts or to justify departure from the established policy protections. In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework and national planning policies, and therefore cannot be supported.

1.1.40 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, relying solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern across all three assessment streams. This pattern shows that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation directly stems from the applicant's own documents, which acknowledge the influence of distance on their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis within the applicant's materials describes a High magnitude of effect within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond around 30 kilometres for some landscape types.

This approach has significant implications for the reliability of the assessment's conclusions. By systematically moderating magnitude at distances where some of the most sensitive designated landscapes are located, the protective tests applied rely on understated input values. Consequently, the conclusions drawn do not provide a robust or accurate description of the effects upon which Scottish Ministers are being asked to base their consent decisions. This methodological limitation undermines the assessment's capacity to fully capture and convey the potential landscape and visual impacts at critical receptor locations beyond the stated distance thresholds.

The practical consequence of relying on the visualisation materials submitted in support of the application is that they may not provide a fully accurate impression of the development's true visual impact. This stems from inherent technical and perceptual limitations recognised within NatureScot's visualisation guidance, which the applicant has adopted. Specifically, the guidance acknowledges that printed visualisations cannot replicate the scale that a viewer experiences in the field. Moreover, the wireline drawings included within the same panoramic projections are themselves constrained by the photographic basis they accompany; they function as technical renderings within the visualisation rather than as independent tools to

correct or enhance the photographic depiction. Consequently, the visual evidence presented must be regarded with caution, as it cannot be relied upon to convey the full extent or character of the visual effects. This limitation should be taken into account when assessing the application's overall impact on the landscape and visual amenity.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the intended 35-year operational lifespan. This change is significant as it transforms an existing natural and unlit maritime environment into one marked by artificial lighting, with clear implications for the visual qualities and experiential value of the seascape after dark. Furthermore, the applicant's assessment rightly notes that the 35-year operational period does not diminish the policy significance of this harm. Granting consent for the development effectively signals that this particular seascape is considered appropriate for wind farm use despite the adverse impact on its night-time character. This carries considerable weight in planning terms, as it establishes a precedent regarding the acceptability of lighting effects on seascape character within the policy framework. Consequently, the introduction of permanent aviation and navigation lighting must be carefully weighed against policy objectives aimed at conserving the natural qualities of the seascape, recognising that harm arising from such lighting is enduring and materially alters the night-time environment.

The proposal results in significant landscape and seascape effects that directly engage several key policies, including NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These statutory provisions are designed to safeguard nationally important landscape and seascape interests, reflecting their recognised value and sensitivity.

However, the applicant has failed to substantiate that the scale of these effects aligns with the methodology it purports to have employed. This lack of consistency undermines the credibility of the applicant's conclusions and casts doubt on the robustness of the assessment presented. Without a transparent and accurate evaluation, it is impossible to ascertain compliance with the relevant landscape and seascape protection policies.

In light of the foregoing, the proposal does not demonstrate adherence to the statutory framework established to protect nationally important landscapes and seascapes. Consequently, it falls short of meeting the requirements of the referenced planning policies, warranting refusal on this basis.

1.1.41 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's flawed assessment methodology is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Despite adopting Historic Environment Scotland's recognised approach for evaluating effects on the setting of historic assets, the applicant's assessment fails to demonstrate the critical evaluative step required by that methodology. This omission raises serious concerns about the validity of the claim that the integrity of setting is adequately retained.

Historic Environment Scotland's methodology, as referenced by the applicant, mandates an evaluation focused on whether changes to setting affect the contribution it makes to the cultural significance of heritage assets, not merely an account of visual alterations. Crucially, it specifies that visual change should not be equated directly with adverse impact. However, the applicant's assessment primarily describes visual change through factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, without explicitly assessing the integrity of setting itself.

A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not show how the integrity of setting has been appraised in accordance with the prescribed methodology. None of the examined examples within the Audit reveal the necessary evaluative judgement. This gap in the assessment process means that the conclusions drawn about heritage impacts lack a sound evidential basis, calling into question the overall robustness of the applicant's heritage impact analysis.

The applicant's own baseline acknowledges that the cultural significance of the affected heritage assets arises from a range of qualities, including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. It further recognises the importance of the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, emphasising that these attributes are experienced dynamically through movement rather than from static viewpoints.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted a concern that the assessment may not fully capture these wider experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the broader cultural landscape and its associated values are more comprehensively represented.

This indicates a potential shortfall in the applicant's current evaluation of heritage impacts, suggesting that the assessment might benefit from a more nuanced approach that takes into account the cultural landscape as a whole, rather than focusing predominantly on fixed viewpoints. Such consideration is essential to adequately safeguard the heritage assets' significance in a manner consistent with their identified baseline qualities.

The heritage impact conclusions rely significantly on the landscape assessment, as established in the applicant's evidence. It has been demonstrated that where landscape effects have been understated, this understatement directly affects the reliability of the heritage conclusions that are founded upon them. Consequently, any deficiencies or minimisation within the landscape assessment inherently undermine the credibility of the heritage impact findings. This interdependency calls into question the robustness of the overall heritage evaluation presented.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the stringent requirements set out in NPF4 Policy 7(h) regarding scheduled monuments, and Policies 7(c) and 7(d) concerning their setting, the applicant's submission does not provide the necessary assessment or evidence to

confirm that these assets will be safeguarded in accordance with these policies. Similarly, the requirements of GEN 6 and the guidance in paragraphs 4.22 to 4.23 of the National Marine Plan are not sufficiently addressed, leaving a significant gap in the protection framework that these policies and plans seek to establish.

Furthermore, the absence of a robust heritage impact assessment means that the Scottish Ministers are not in possession of the information needed to conclude that the proposal complies with the relevant heritage protection policies. Without this critical appraisal, the application cannot be considered to meet the policy tests designed to ensure the conservation of heritage assets. This deficiency undermines the acceptability of the proposal, as it fails to provide the assurances required by national planning policy and marine planning guidance for the protection of heritage interests.

1.1.42 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, whose presence underpins the local economy and social fabric. These visitors are attracted specifically by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic foundations of these communities. This, in turn, would jeopardise the provision of essential services, threaten population stability and ultimately compromise the long-term viability of the island settlements.

The applicant's socio-economic assessment fails to adequately address the specific vulnerabilities of the island communities potentially affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway through which impacts could manifest, no targeted assessment of the habitability of these islands was undertaken. Instead, the analysis in Chapter 18 focuses predominantly on regional dynamics, providing detailed scrutiny of port communities but neglecting an equivalent place-based evaluation of the island settlements facing the development. This methodological approach leads to the unsupported conclusion that these island communities have low sensitivity to tourism-related effects, a finding that lacks empirical foundation given the absence of direct, localized investigation.

The inadequacy of this assessment is further underscored by the economic characteristics of small island communities, which are not accurately represented by regional averages. Their economies are highly concentrated in sectors that are directly dependent on the attributes attracting visitors, meaning that any degradation of these qualities would disproportionately affect them. Far from mitigating sensitivity, a reliance on increasing visitor numbers intensifies the communities' dependence on the very conditions that may be compromised by the proposal. Therefore, the conclusion of low sensitivity without detailed, place-specific analysis is not a demonstration supported by evidence but rather an unsubstantiated assumption. This fundamental flaw in the applicant's methodology significantly undermines confidence in the socio-economic assessment and the adequacy of proposed mitigation measures for island communities.

The proposal fails to demonstrate compliance with essential policies and statutory duties protecting island communities, as required by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decision-making be grounded in robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and given due weight through meaningful engagement throughout the planning process.

Despite acknowledging the necessity for particular scrutiny of island communities, the applicant has not conducted the comprehensive assessment needed to understand the potential impacts on these communities. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This omission undermines the reliability of the socio-economic evidence base and fails to meet the standards set by the relevant policies and legislation.

In conclusion, given the absence of adequate assessment and engagement with island communities, the proposal does not satisfy the mandatory planning and statutory requirements. It consequently cannot be considered compatible with the sustainable development of island communities and should therefore be refused.

1.1.43 Ecology, Biodiversity and Habitats Regulations

While mitigation measures are proposed, they are unlikely to fully address the significant risks posed to Priority Marine Features and Annex I habitats present within the development area. The surrounding waters also support important populations of seabirds, marine mammals, and basking sharks, all of which would be exposed to disturbances from large-scale construction, operation, and decommissioning activities extending over several decades. Given the ecological sensitivity and the scale and duration of the proposed development, there is a substantial potential for significant adverse environmental effects that mitigation alone cannot adequately prevent.

The applicant’s submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan indicates an acknowledgement that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically on its guillemot population. Such documents are typically prepared only when it cannot be confidently concluded that the site’s integrity will remain unaffected. This approach suggests that the applicant anticipates the possibility of Scottish Ministers reaching a different conclusion regarding potential adverse effects. Therefore, while these submissions demonstrate a proactive attempt to address and mitigate potential impacts through derogation provisions, they also highlight an inherent uncertainty in the application’s environmental assessment that warrants careful consideration.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential

burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

This strict framework is set out in the Habitats Regulations and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). These collectively establish a high threshold for consent, ensuring that developments must meet rigorous environmental safeguards before approval can be lawfully granted. Consequently, planning decisions must be informed by robust scientific evidence to uphold these protections effectively.

The application before the authority has not demonstrated compliance with the statutory tests designed to protect internationally important habitats and species. This failure is evident from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty that these legal requirements can be met. As such, the risk of harm to protected ecological features remains unacceptably high.

It is essential to recognise that these statutory protections are in place precisely to safeguard internationally significant environmental assets. The applicant's inability to satisfy these tests undermines the fundamental purpose of these safeguards. Without clear and demonstrable evidence that the statutory criteria have been fulfilled, the justification for granting consent is significantly weakened.

In conclusion, the absence of robust assurance that the statutory tests have been met means the application cannot lawfully proceed. For these reasons, the proposal should be refused to ensure the continued protection of internationally important ecological interests.

1.1.44 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the current assessment process due to the fragmented manner in which the project is presented. Only a portion of the project is before the Scottish Ministers at this stage. Crucial components, namely the export cable corridor and the onshore transmission works, are deferred to future applications. These elements are indispensable for the operation of the wind farm, yet they have not been included in the current evaluation.

This piecemeal approach results in the effects of the entire project never being assessed collectively. Instead, significant parts are left to be considered through subsequent consenting processes, which would occur only after the principal decision on the initial application has been made. Such fragmentation undermines the integrity of the assessment and leads to an incomplete understanding of the overall impacts.

Moreover, this approach is inconsistent with established legal principles. The courts, as affirmed in Raeshaw Farms, have made clear that a project must be assessed in its entirety and not divided into smaller parts whose individual effects seem

diminished. Therefore, the current assessment method is procedurally and legally flawed, as it prevents a comprehensive evaluation of the project's cumulative impacts.

The Environmental Impact Assessment's cumulative assessments rely fundamentally on the findings established in preceding sections concerning landscape, heritage, and socio-economic factors. It is evident that these initial assessments understate the effects, resulting in a baseline that does not fully reflect the true environmental context. Consequently, the cumulative assessment, which aggregates the combined impacts of the proposed development alongside existing, consented, and foreseeable projects, is founded upon this diminished baseline.

This reliance on an understated baseline leads directly to an underestimation of the overall cumulative effects. By beginning from a reduced baseline, the assessment fails to capture the full scale and severity of combined impacts, thereby presenting an overly optimistic view of the proposal's environmental consequences. Such a flaw undermines the reliability of the cumulative impact assessment and calls into question its adequacy for informed decision-making.

The planning application fails to comply with key policy and regulatory requirements concerning project splitting and the assessment of cumulative effects, resulting in an incomplete and potentially misleading evaluation. Specifically, the proposal does not satisfy the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e) and the stipulations of the Environmental Impact Assessment Regulations relating to project splitting. The applicant has not adequately demonstrated that the cumulative and in-combination effects of the development, including any deferred works associated with the project, have been thoroughly identified and assessed. This omission undermines the integrity of the environmental assessment and risks overlooking significant impacts that may arise when the entire scope of the project is considered collectively. Consequently, it is imperative that the decision-making process explicitly addresses how the deferred works will be treated to ensure a comprehensive and compliant evaluation. Without such clarification and assessment, the proposal remains non-compliant with established planning policies and environmental regulations.

1.1.45 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the Scottish Ministers should place significant weight on the site-selection process, thereby rendering the quality of public participation in that process directly material to their decision. However, the deficiencies observed in participation at both the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is at its lowest. This timing contrasts sharply with the applicant's prolonged preparation period, supported by substantial professional and financial resources.

According to GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must have a

realistic opportunity to participate in decisions of this magnitude. The conditions under which the affected island communities have been required to respond fall short of this standard. It is therefore imperative that the Scottish Ministers bear these shortcomings firmly in mind when weighing the representations made, recognising that the legitimacy of the site-selection process is undermined by these deficiencies in public participation and consultation timing.

The Environmental Impact Assessment (EIA) submitted with the application serves as the principal evidential basis for the determination process. However, its sufficiency is brought into question by a number of critical deficiencies identified across several key topics. Notably, the application highlights pathways to significant environmental effects but fails to investigate them comprehensively. For instance, the landscape assessment reaches conclusions based on a distance pattern that is not supported by the methodology it purports to follow. Similarly, the heritage assessment does not adequately demonstrate the application of its stated integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis pertinent to the affected islands, thereby omitting essential context for understanding potential impacts. These shortcomings indicate that the assessment does not meet the standard required to fully inform decision-making.

Compounding these issues, the application relies in several instances on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding matters. This approach is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be comprehensively understood before the determination of the application. The Scottish Ministers are obliged to make their decision based on the evidence currently before them and cannot assume that unresolved issues will be satisfactorily addressed at a later stage. Given the inadequacies of the environmental information provided, the applicant has not demonstrated that it is adequate for the purposes of informed and lawful decision-making. Consequently, the environmental information accompanying the application is insufficient to support its approval.

1.1.46 Effects on Local Area

The applicant’s assessment fails to adequately consider the direct and significant impacts on the communities of Islay, Colonsay, and Oronsay, resulting in an incomplete understanding of the development’s consequences. Although the development area, covering 448 square kilometres, lies immediately north-west of Islay and west of Colonsay, Islay is primarily regarded as a potential project site rather than as a distinct island community affected by the proposal. This oversight neglects the reality that Islay’s Atlantic-facing communities are the closest inhabited areas to the development and are likely to experience changes to their setting, economy, and community life without any detailed, place-based analysis.

For Colonsay and Oronsay, the situation is particularly acute as the seaward outlook that shapes everyday life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which forms Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, highlighting an admission that harm to the internationally protected seabird population cannot be ruled out.

This clearly signifies substantial environmental risks to the local ecology that are insufficiently addressed in the current assessment.

Moreover, the heritage significance of Oronsay Priory, a scheduled monument of national importance located within this community, is inadequately protected. The gaps identified in the heritage assessment concerning its open maritime setting remain unaddressed, further undermining the reliability of the heritage impact evaluation. Taken together, these deficiencies demonstrate that the application underestimates the full scope of effects on these islands, calling into question the robustness of its environmental and heritage impact conclusions.

The applicant's assessment of visual and community impacts on Iona significantly underestimates their scale and importance, particularly when compared to established mitigation benchmarks. The Coastal Character assessment assigns the Sound of Iona a high sensitivity, noting its direct orientation towards the development area and extensive visibility. The scale of visual change is substantial, spanning approximately 21 kilometres with turbines covering about 39 degrees of the horizon. This magnitude of effect is classified as Moderate and Significant. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, the highest point. However, such recognition falls short of adequately addressing the depth of impact, especially given that familiar landmarks like Ben Hynish on Tiree, standing at 141 metres and visible from 33 kilometres, would be visually dominated by turbines extending roughly 194 metres at a closer distance of approximately two-thirds that range. This comparison underscores the disproportionate visual intrusion posed by the proposed development, which the applicant's own evaluation does not fully mitigate.

The heritage and community implications further reveal critical gaps in the assessment. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and high crosses, holds international significance, intrinsically linked to pilgrimage and sea arrival routes, as identified in the applicant's baseline studies. Despite Historic Environment Scotland's requests for additional viewpoints, including from the ferry crossing itself, the applicant has not provided visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby limiting the understanding of visual impacts on heritage assets. Moreover, community consultation on Iona indicates overwhelming opposition, with 92 per cent of households objecting to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the island's community, yet no assessment of this pathway has been undertaken. This omission further compromises the accuracy and completeness of the environmental and social impact evaluation, leading to an underrepresentation of the true scale and significance of effects on Iona.

The applicant's assessment acknowledges significant effects on several key locations around Mull and the Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort, recognising these as areas of high sensitivity and accepting medium magnitude impacts over distances of approximately 21 to 33 kilometres. However, the proposed mitigation measures appear insufficient when compared to the scale of these acknowledged effects, particularly given the economic and

community reliance on these areas. For instance, Fionnphort, as the principal gateway to Iona and the primary embarkation point for visitors, is directly linked to the flow of tourism that underpins the local economy. Despite this, there is no detailed, place-based assessment addressing the specific consequences for communities so closely tied to visitor experience.

Furthermore, the assessment's reliance on distance-based criteria to downplay the effects on more remote but sensitive landscapes, such as the Wilderness and Gribun Rocks coastal area, is problematic. Although the applicant judges the scale of change to be small at viewing distances beyond 30 kilometres, this approach fails to capture the broader visual and economic impacts on Mull's west-facing tourism economy. This economy, alongside wildlife boat operations and accommodation providers in western townships, depends heavily on the integrity of the Atlantic seascape—an environment that would be industrialised by the development. The lack of focused, place-specific evaluation for these communities undermines confidence in the assessment's conclusions and highlights the need for a more comprehensive appraisal of effects on both designated landscapes and tourism-dependent populations.

While the applicant's assessment acknowledges some effects on designated landscapes, it significantly underestimates the extent and significance of impacts on wider seaboard National Scenic Areas and vulnerable island communities. For example, Ulva, located within the Loch na Keal National Scenic Area, experiences the full effects identified for that landscape, yet no specific assessment has been undertaken despite Ulva being a community-owned island undergoing regeneration, reliant on the very qualities of its unspoilt seascape and setting that are at risk. Similarly, Staffa—one of Europe's most renowned small islands and also within the same National Scenic Area—lies about 35 kilometres from the development, beyond the 30-kilometre range for detailed assessment requested by NatureScot. The applicant nonetheless concludes that any change at Staffa would be small and not significant, despite accepting the island's panoramic maritime qualities. The Jura National Scenic Area, assessed at a distance of roughly 28 to 32 kilometres, is assigned only a Medium to Low magnitude of effect due to perceived distance and retained landforms, yet this designation is founded on its wild, undeveloped Atlantic character, which would be compromised. The Scarba, Lunga, and Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is afforded the same limited consideration. Collectively, these assessments fail to fully recognise or address the substantial and cumulative impacts on the natural and cultural qualities of these sensitive landscapes and communities.

The applicant's assessment acknowledges the South Tiree coastal area as possessing High sensitivity at an approximate distance of 35 kilometres from the proposed development, yet paradoxically attributes a Low magnitude of change to this receptor. This juxtaposition is critical because it directly informs the overall evaluation of landscape effects. The designation of High sensitivity reflects the acknowledged vulnerability and distinctive qualities of this part of Tiree's coastline, which underpins the landscape's character and the community's connection to place. However, the Low magnitude rating appears incongruous with the acknowledged sensitivity and the scale of the proposed turbines, suggesting a significant understatement in the assessment's appraisal of impact severity.

Tiree itself is characterised as an exceptionally low-lying island, with a landscape defined predominantly by the interplay of sea and sky, and the absence of substantial vertical features. The island's highest point, Ben Hynish, reaches only 141 metres, and the open oceanic horizon forms an integral aspect of its distinctive landscape character. The introduction of turbines up to 335 metres tall would represent unprecedented vertical structures within this seascape, dramatically altering the visual composition and experiential qualities of the area. Given such a profound potential change, the conclusion of Low magnitude for this receptor does not reliably reflect the true scale of impact. This discrepancy leads to an evaluation of effects on Tiree's sensitive and distinctive landscape character that is insufficiently robust, undermining confidence in the overall conclusions drawn in the assessment.

While the applicant's assessment attempts to moderate effects based on distance, this approach inadequately addresses the significant impacts experienced by mainland and island communities with direct visual and economic connections to the seascape. For instance, Gigha, a community-owned island renowned as a national symbol of island regeneration, faces the development waters directly to the east. Despite its finely balanced community and economy, the effects on Gigha have not been examined, leaving a critical gap in understanding the development's local influence. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based mitigation approach the applicant employs, yet their significance is not fully acknowledged. Furthermore, the west coast of Kintyre comprises a chain of communities whose identity and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. Collectively, these unassessed effects on communities closely connected to the seascape indicate that the applicant's assessment lacks comprehensiveness and fails to capture the full scope of potential socio-economic and visual impacts.

There remains considerable uncertainty regarding the applicant's approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect's significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant's methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.47 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Please stop selling away our culture and landscape. You're reminding me of Thatcher.

1.1.48 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the applicable statutory and policy frameworks. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Furthermore, the necessary heritage assessment has not been conducted. While the presence of effects on the island communities affected by the development was identified, no formal assessment of these impacts has been undertaken. In addition, the ecological tests required under the relevant legislation remain unproven, and it is notable that only a portion of the project is currently before the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, a public inquiry should be held prior to determination, to allow a thorough examination of the issues raised in this objection. Regardless of the decision reached, it is also urged that the Ministers provide clear and explicit conclusions within their reasons, specifically addressing the effects on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 106
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded, that I be recognised as an objector, and that I receive notification of the determination of these applications.

The project in question seeks approval for an offshore wind energy development with an installed capacity of approximately 2 gigawatts. It proposes between 91 and 144 wind turbines, each reaching a maximum height of 335 metres to blade tip. The proposed site covers some 448 square kilometres of marine area located north-west of Islay and to the west of Colonsay, situated approximately 21 kilometres from Iona and in proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in planning and environmental concerns assessed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the responsibility lies squarely with the applicant to demonstrate, through robust and sufficient evidence, that all relevant statutory tests and policy requirements are met. Objectors, conversely, carry no obligation to disprove the proposals. Having considered the material submitted and the applicable criteria, it is clear that the applicant has failed to satisfy these burdens. Consequently, permission for the development should be withheld.

1.1.49 Legislative and Policy Framework

The application fails to demonstrate that reasonable steps have been taken to mitigate adverse effects on natural beauty, flora, fauna, geological or physiographical features of special interest, and sites, buildings or objects of architectural, historic or archaeological interest, as required by Schedule 9 of the Electricity Act 1989. The evidence does not establish that the applicant has adequately addressed these statutory duties, nor does it provide sufficient detail on mitigation measures to offset the identified impacts. This omission is critical because the statutory framework explicitly mandates both the applicant and the Scottish Ministers to have regard to these considerations in the determination process.

Furthermore, the application exhibits clear deficiencies and omissions in complying with the legal and policy requirements set out in Schedule 9. The absence of demonstrated compliance and the presence of evidential shortcomings directly conflict with the statutory duties under the Electricity Act 1989. Such failures weigh decisively against the granting of consent, as the statutory regime prioritises the preservation and protection of natural and cultural heritage interests, which the application does not satisfactorily uphold.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set out in

Scotland's National Marine Plan. The applicant's submission has not demonstrated compliance with the relevant statutory requirements and the applicable National Marine Plan policies, which include but are not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively form an integral part of the statutory assessment framework for the application.

The evidence clearly indicates that the application fails to meet the standards required by these policies. There are identifiable deficiencies and omissions within the application documentation, including a lack of sufficient evidence to demonstrate that the proposal will not adversely affect the historic environment, landscape character, natural heritage, or cumulative impacts in the marine area. The application does not adequately address the requirements for meaningful engagement as set out in GEN 18, nor does it provide sound evidence as mandated by GEN 19. The absence of such compliance and the presence of these shortcomings constitute a direct conflict with the statutory and policy framework governing marine licence determinations.

Given that compliance with the National Marine Plan policies is a statutory requirement under the Marine (Scotland) Act 2010, and that the application has not demonstrated such compliance, these failures weigh decisively against the granting of consent. The application's deficiencies and conflicts with the legal and policy framework are material considerations that must be given substantial weight in the decision-making process. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the statutory requirements and relevant policies of the National Marine Plan.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence provided by the applicant fails to demonstrate compliance with these policies. There are clear deficiencies and omissions in the submission regarding the protection and enhancement of biodiversity and natural places, as well as inadequate consideration of the impact on historic assets. Furthermore, the proposal does not satisfactorily address the energy policy requirements set out in Policy 11. These shortcomings amount to a failure to meet the comprehensive policy framework established by NPF4.

Where compliance with NPF4 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The applicant's failure to provide sufficient evidence of conformity with the statutory and policy requirements under NPF4, particularly in relation to biodiversity, natural places, historic assets, and energy, constitutes a fundamental flaw in the proposal. Consequently, the proposal is contrary to the relevant provisions of NPF4 and should be refused on these grounds.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests.

The evidence before the determining authority reveals that compliance with these statutory requirements has not been demonstrated. There are clear deficiencies and omissions in the environmental impact assessment and the habitats regulations assessment submitted. These shortcomings represent a failure to meet the legal and policy framework governing such proposals.

Given these unresolved deficiencies and the absence of adequate assessment, the proposal conflicts with the mandatory environmental and habitats legislation. As a result, these failures weigh decisively against the granting of consent for the development.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. There is no evidence within the application or supporting documents that these statutory obligations have been met, nor that any meaningful assessment or mitigation of impacts on island communities has been undertaken.

Given this failure to address the statutory duty, the proposal exhibits clear deficiencies and omissions in its consideration of island community interests. As established by the Act and confirmed in the approved evidence, such shortcomings constitute a conflict with the applicable legal and policy framework. Consequently, these matters weigh decisively against the granting of consent for the development.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements through robust, objective, and proportionate evidence. This evidential burden is a prerequisite for the lawful determination of the application. The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a clear failure to satisfy the applicable legal and policy framework. Consequently, these shortcomings must be given significant weight against the granting of consent. In summary, the application does not meet the necessary evidential standards required to establish compliance, and therefore, consent should be refused.

1.1.50 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. While Policy 11 endorses renewable initiatives, this support is expressly conditional upon adherence to specific impact tests, including those

relating to communities, landscape, seascape, and other receptors as detailed in Policy 11(c), (d), and (e). In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contravening the protections these areas require. Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, a key requirement to ensure heritage assets are safeguarded. Additionally, there is no evidence that the interests of island communities would be adequately protected, raising concerns about social and environmental sustainability. Finally, the ecological assessments provided have not established that the necessary environmental tests can be met, leaving unresolved risks to biodiversity and habitat integrity. Taken together, these shortcomings indicate that the proposal conflicts with the fundamental impact criteria of NPF4 Policy 11 and, as such, does not warrant policy support in its current form.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, thereby failing to protect the qualities for which these areas have been designated. This outcome directly conflicts with Policy 11 and related provisions within NPF4, which are designed to safeguard the integrity and character of National Scenic Areas and other nationally important landscapes as outlined in Policy 4(c) and 4(d).

Furthermore, the submission does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. Policies 7, including 7(h), and 7(c) and 7(d), require clear evidence that such heritage assets will be protected from harm. The absence of such demonstration undermines compliance with the NPF4 framework intended to conserve these irreplaceable assets and their contextual environments.

In addition, the proposal lacks sufficient evidence to confirm that island communities would be safeguarded or that the necessary ecological tests under Policy 3 on biodiversity can be met. Without these assurances, the development cannot be considered consistent with the comprehensive protections afforded by NPF4. Consequently, the proposal fails to comply with multiple policies designed to protect designated assets, necessitating its refusal in order to uphold national planning objectives.

The practical consequence of the proposed development is its adverse impact on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These elements are fundamental to the character and identity of the area, and the proposal’s effects on land-based receptors directly undermine the protections established within the terrestrial development plan framework.

This conflict with the Local Development Plan 2 means that the proposal fails to align with the policies designed to preserve the natural and cultural environment. The planning framework’s purpose is to ensure that development contributes positively to the local area, yet in this case, the scheme would detract from key environmental and social values, contravening the intended outcomes of the adopted plan.

Furthermore, the proposal is inconsistent not only with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise. Consequently, the proposal should be regarded as contrary to the relevant development plan policies and national planning objectives, which weigh decisively against its approval.

1.1.51 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, analysis derived from the applicant's own Chapter 16 and Appendices 16.1 to 16.3, as detailed in a published Evidence Note supporting community objections, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This demonstrates an implicit influence of distance on the assessment outcomes.

Further examination of the applicant's documentation highlights the explicit role that distance plays in shaping judgements. For instance, the assessment of a coastal area situated over 30 kilometres away describes the scale of change as small, explicitly attributing this to the viewing distance. Moreover, the Landscape Character synthesis categorises the magnitude of effect as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation underscores a systematic moderation of impact magnitude correlated with increasing distance.

The critical consequence of this approach is that the protective tests, which are fundamental to the planning assessment, are being applied to inputs that are understated. Since the magnitude is consistently reduced at distances coinciding with the locations of the most sensitive designated landscapes, the conclusions drawn from the assessment do not reliably represent the true effects that the Scottish Ministers are being asked to consider for consent. This calls into question the robustness and accuracy of the applicant's assessment methodology and its suitability for informing decision-making in this context.

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance. This guidance explicitly recognises that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. As such, while these materials provide a representation of the proposed development, they inherently possess technical and perceptual limitations that must be acknowledged in the assessment process.

Moreover, wireline drawings included within the same panoramic projections share these intrinsic limitations. Rather than serving as independent corrective tools, they are technical renderings embedded within the visualisation framework and thus subject to the same constraints as the accompanying photographic imagery. This means that although wirelines can assist in understanding the structural aspects of

the proposal, they do not overcome the fundamental challenges of accurately conveying spatial relationships and scale.

Given these factors, it is important to interpret the visual evidence cautiously, recognising that such materials may not fully capture the experiential qualities of the site from various viewpoints. While they are valuable components of the assessment, reliance solely on these visualisations without supplementary field appraisal or consideration of their limitations may not provide a comprehensive understanding of the visual impact.

The applicant's evidence acknowledges that the development would introduce aviation and navigation lighting to a currently unlit sea horizon, thereby permanently altering the character of the night-time seascape throughout its stated 35-year operational lifespan. This alteration is significant, as it creates a fundamental change from the existing natural condition of the seascape after dark. The evidence emphasises that the duration of the development's operation does not mitigate the policy harm incurred; consenting to the development effectively signals that the seascape is deemed appropriate for wind farm use despite the adverse impact on its nocturnal character. In summary, while the introduction of lighting is a necessary operational requirement, it constitutes a permanent and policy-relevant change to the night-time seascape that must be carefully weighed in the planning decision.

The proposal's failure to comply with key planning policies has tangible consequences for the protection of nationally important landscapes and seascapes. This non-compliance undermines the effectiveness of the planning framework designed to safeguard these valuable environments, potentially leading to significant and unacceptable adverse effects. The practical outcome is that the proposal cannot be supported as it risks causing harm contrary to established policy objectives.

Specifically, the effects of the development engage several relevant policies, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively set out clear requirements to ensure that landscape and seascape interests are preserved and enhanced where possible. The applicant has not shown that the conclusions drawn about the scale of these effects align with the methodology it employs, creating uncertainty and a lack of confidence in the assessment provided.

The absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes and seascapes, the planning authority cannot reasonably be expected to grant consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.52 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets does not comply with the required methodology, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the applicant states that it adopts

Historic Environment Scotland's recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment fails to demonstrate this evaluative step. It is clear from the applicant's approach that visual change is described in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation; however, the methodology explicitly states that visual change should not be equated directly with adverse impact, a distinction that the assessment does not adequately address.

A Methodological Audit, relying solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not show how the integrity of setting has been evaluated against the applicant's own accepted methodology. The audit highlights that the conclusion—asserting that the integrity of setting is adequately retained—is not supported by a demonstrable evaluative process. This omission calls into question the robustness and validity of the assessment's findings on heritage impacts, and the evidence base upon which the applicant's conclusions rely.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets under consideration derives from a range of qualities extending beyond the physical structures themselves. These include aspects such as pilgrimage traditions, arrival by sea, and movement through a living cultural landscape. The relationships between monuments, spirituality, and the surrounding landscape and seascape are highlighted as fundamental to the heritage value, with an emphasis on experiential qualities encountered through movement rather than solely from fixed viewpoints. This recognition underscores the complex and dynamic nature of the heritage assets' cultural significance.

However, the assessment as submitted does not fully capture these broader experiential qualities. Historic Environment Scotland's consultation responses, which are recorded within the application documentation, specifically requested additional viewpoints to be incorporated into the assessment. This request was made to ensure that the wider cultural landscape and the intangible qualities associated with movement and spatial relationships are properly represented. Their input suggests that the current assessment might under-represent the full extent of cultural significance by focusing primarily on static views rather than encompassing the experiential and relational dimensions of the heritage assets.

Given the applicant's own acknowledgement of the importance of these broader qualities and the advice from Historic Environment Scotland, it would be prudent to enhance the assessment methodology to include a more comprehensive range of viewpoints. This would provide a more robust evaluation of the heritage impacts in terms of the cultural landscape and experiential values. Such an approach would better align with the intrinsic qualities identified as central to the significance of the affected heritage assets and support a more informed decision-making process.

The heritage impact conclusions presented in the application are fundamentally reliant on the underlying landscape assessment. It is evident that where the landscape effects have been understated, as previously demonstrated, any heritage conclusions derived from this assessment consequently reflect the same

understatement. This dependency indicates a cascading effect whereby inaccuracies or minimisations in the landscape evaluation directly compromise the reliability of the heritage impact findings.

Given this interdependence, the credibility of the heritage conclusions is significantly undermined. Without a robust and accurate landscape assessment, the heritage impacts cannot be properly understood or mitigated. Therefore, the planning considerations should not accept the heritage conclusions at face value but rather recognise that their foundation is flawed.

The application fails to comply with key policy requirements intended to safeguard heritage assets. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, Scottish Ministers do not have before them the comprehensive assessment that such a conclusion would necessitate. Consequently, the application does not meet the necessary heritage protection standards and is not acceptable.

1.1.53 Effects on Island Communities, Tourism and the Local Economy

There remains significant uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors who are drawn by the very qualities identified in the applicant’s own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any changes to these essential attributes would directly undermine the economic foundations of these communities, with consequent effects on local services, population stability and their overall viability. It is therefore essential to recognise that the proposal poses a serious threat to the continued sustainability of these island communities.

The practical consequence of the applicant’s flawed socio-economic assessment is a failure accurately to identify and mitigate potential impacts on island communities. The applicant’s own consultants recognised habitability as a potentially significant pathway through which the proposal could affect island communities; yet, no assessment of the habitability of the affected islands was conducted. Instead, Chapter 18 of the socio-economic assessment addresses potential port communities at a regional scale in detail, while omitting any equivalent place-based analysis of the island communities directly facing the development. Despite this omission, the assessment concludes that those island communities exhibit low sensitivity to tourism effects. This conclusion is fundamentally flawed. Small island economies are not representative of regional averages; rather, their economies are concentrated in sectors highly vulnerable to changes in the qualities that attract visitors. Moreover, a reliance on increasing visitor numbers does not diminish their sensitivity; it intensifies dependence on the very qualities that are at risk. Therefore, the conclusion of low sensitivity, reached without a place-based analysis, cannot be regarded as evidence but must be understood as an unsupported assumption. This methodological

inadequacy undermines confidence in the assessment's findings and calls into question the effectiveness of any proposed measures to address socio-economic impacts on these island communities.

The proposal fails to comply with the relevant planning policies and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be founded on robust socio-economic evidence and apply a precautionary approach when such evidence is insufficient. Furthermore, it contravenes NPF4 Policy 11(c) and the obligations under the Islands (Scotland) Act 2018, all of which require that the interests of island communities be properly assessed and given due weight through meaningful engagement from the outset to the conclusion of the planning process. The applicant acknowledged that island communities warrant particular consideration but failed to undertake the necessary assessments to understand the potential effects on them. Consequently, the proposal has not demonstrated compatibility with the sustainability of island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. In light of these deficiencies, the proposal does not meet the required planning and statutory standards and should therefore be refused.

1.1.54 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant's submission of both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan are themselves acknowledgments of potential adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared in situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. This approach implicitly recognises that existing mitigation measures may be insufficient to prevent harm to the designated site and its qualifying features.

Importantly, the submission of these derogation and compensation documents is a notable element of the application, as it reflects the applicant's understanding that the Scottish Ministers might reach a different conclusion regarding the likelihood of adverse effect. This procedural step underscores the uncertainty around the impacts and the necessity for compensatory measures should derogation be granted. Consequently, the reliance on these Without Prejudice documents calls for careful scrutiny to ensure that any potential harm is appropriately addressed and that the

integrity of the protected site is preserved in accordance with relevant conservation obligations.

Consent for developments that may affect protected habitats and species is subject to a rigorous legal requirement: permission can only be granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the protected site. This standard is exacting, requiring that no reasonable scientific doubt remains regarding the absence of harm. Where this cannot be assured, consent may only be lawfully granted if the proposal meets the strict derogation tests set out under the Habitats Regulations.

The responsibility for satisfying this evidential standard lies firmly with the applicant. Proposals relying solely on mitigation measures, compensation strategies, or future monitoring cannot, in isolation, demonstrate compliance with the statutory tests. This reflects the precautionary principle inherent in the protection of habitats and species, ensuring that decisions are based on robust, scientifically sound evidence rather than contingent or speculative measures.

This framework is reinforced through multiple layers of policy and regulation, including the Habitats Regulations themselves, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions establish a comprehensive and stringent approach that governs the consent process, underscoring the critical need for thorough and conclusive assessment before development affecting protected sites can be authorised.

The applicant's own derogation documents, as submitted in support of the application, indicate a significant degree of uncertainty regarding the satisfaction of the statutory tests designed to protect internationally important habitats and species. The evidence clearly shows that the applicant has not provided sufficient assurance that these legal requirements will be met. This lack of demonstrable compliance raises serious concerns about the potential for harm to ecological features of international significance.

Given the paramount importance of these statutory protections, the failure to establish that the tests can be satisfied fundamentally undermines the justification for granting consent. Without clear evidence that the legal thresholds have been met, approval of the application would be inconsistent with the obligation to safeguard internationally important ecological assets. Therefore, the application should be refused on the grounds of non-compliance with the requisite statutory environmental safeguards.

1.1.55 Cumulative and In-Combination Effects

The applicant's evidence clearly establishes that only a portion of the overall development is currently before the Scottish Ministers for consideration. Specifically, the export cable corridor and the onshore transmission works, which are integral components without which the wind farm cannot function, have been deliberately deferred to subsequent applications. This segmentation means that the cumulative effects of the entire project are never assessed concurrently, with critical elements

subjected to separate consenting processes following the primary decision. Such an approach is fundamentally flawed, as it undermines the ability of decision-makers to fully comprehend the full scope and impact of the development at the time of determination.

This procedural fragmentation is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment, which mandates that a project must be evaluated in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. By salami-slicing the development into discrete components, the current assessment method effectively circumvents comprehensive scrutiny, potentially obscuring cumulative environmental and planning impacts that would otherwise emerge through an integrated evaluation. Consequently, this approach cannot be considered legally or procedurally sound, and it is imperative that the project be assessed as a whole to ensure compliance with planning law and proper environmental governance.

The cumulative impact assessment relies heavily on baseline evaluations that have already been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. Given that the foundational Environmental Impact Assessment adopts this reduced baseline, any subsequent cumulative analysis necessarily inherits these limitations. As a result, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are inherently undervalued.

This methodological flaw undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential harm. Without an accurate and robust baseline, the true scale of cumulative impacts remains obscured, leading to an incomplete understanding of the proposal’s broader consequences. Consequently, the assessment cannot be considered a sound basis for informed planning decisions.

In comparison to the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, and NPF4 Policy 11(e), the applicant’s submission falls short in adequately addressing the mitigation of cumulative and in-combination effects arising from the proposal. The Environmental Impact Assessment Regulations explicitly require that project splitting be avoided to ensure a comprehensive evaluation of all effects associated with a project. However, the applicant has failed to demonstrate that these effects, particularly those stemming from the project as a whole, have been reliably identified and thoroughly assessed. This lack of clarity undermines confidence in the mitigation measures proposed and raises concerns about the potential for unaddressed environmental impacts.

Furthermore, the treatment of deferred works has not been expressly addressed in the application or supporting documentation. Given that these deferred components could significantly influence the overall environmental outcomes, their omission from the assessment contravenes established planning and environmental policy requirements. It is imperative that the decision-making process explicitly considers the cumulative implications of both the current proposal and any associated deferred works to ensure compliance with relevant policies and regulations. Without such

consideration, the determination would be incomplete and potentially non-compliant with the statutory framework.

1.1.56 Public Engagement, Site Selection and Environmental Information

The applicant’s submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant’s advantage, having had years to prepare the case with considerable professional and financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole - please see e.g. Iona Community Council's objection which explains the inadequacy of consultation in 2020 re W1. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The Environmental Impact Assessment (EIA) submitted with this application constitutes the primary evidential basis for the Scottish Ministers’ determination. However, it is not the extent of the assessment that is in question, but rather its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate these adequately. For example, the landscape assessment produces outcomes that follow a distance pattern not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands.

Moreover, the application frequently relies on future assessments, post-consent plans, monitoring programmes, and additional approvals to address outstanding issues. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make decisions based on the evidence before them at the time of determination, rather than on the assumption that unresolved matters will be satisfactorily addressed at a later stage. In this regard, the applicant

has not demonstrated that the environmental information submitted is adequate to enable an informed decision.

1.1.57 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment significantly underestimates the scale and importance of the visual and community impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with extensive visibility and a moderate but significant overall effect extending approximately 21 kilometres, where turbines span around 39 degrees of the horizon. Similarly, the West Coast of Iona, including its highest point at Dùn Ì, is acknowledged as highly sensitive with widespread visibility, and the applicant accepts significant effects for residents and visitors. Despite this, the assessment fails to fully address the community's concerns and the implications for habitability, a pathway of impact recognised by the applicant's own consultants but never properly examined.

Iona's heritage assets, notably its internationally important monastic landscape comprising the Abbey, the Nunnery, and the high crosses, are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission compromises the accuracy of the heritage impact assessment and fails to reflect the true extent to which the development would affect the island's cultural significance and visitor experience.

The practical implications of the visual scale are stark when compared to familiar landmarks. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at about 33 kilometres, would be dwarfed by the proposed turbines, which would

exceed it in height by approximately 194 metres at roughly two-thirds of the distance. This comparison underscores the overwhelming presence the turbines would have on the island's landscape and the lived experience of its community. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting the depth of local opposition and reinforcing that the assessment's conclusions do not reflect the community's perspective or the development's true impact.

When considering the applicant's assessment in relation to the effects on Mull and the Ross of Mull coastal communities and landscapes, it is important first to compare the proposed mitigation measures against the scale and nature of the impacts identified. The assessment acknowledges significant effects at key locations such as Erraid and along the Core Paths of the Ross of Mull South coastal area, which is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors, is accepted by the applicant as experiencing significant effects. This community is intrinsically connected to the visitor flows, underscoring the potential for substantial socio-economic consequences.

Extending across Mull, the applicant also accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is consistently assessed as having High sensitivity at viewing distances ranging from approximately 21 to 33 kilometres. However, the applicant attributes no more than a Medium magnitude to the impacts here, which may understate the true significance given the area's national scenic importance.

The approach taken towards the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Despite the acknowledged viewing distance of over 30 kilometres, the applicant judges the scale of change to be small, relying primarily on distance-based reasoning. This method, as outlined in the applicant's own terms, risks overlooking the qualitative aspects of visual and experiential impact that extend beyond mere separation distance.

Crucially, the west-facing tourism economy of Mull, including its wildlife boat operations and the accommodation sectors in its western townships, is deeply dependent on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet none of these communities has been afforded a detailed, place-based assessment within the applicant's documentation. This omission limits the understanding of the potential adverse effects on communities whose livelihoods are closely tied to the natural environment and visitor experience.

In conclusion, while the applicant recognises some significant effects, the reliance on distance as a primary determinant and the attribution of only Medium magnitude in areas of acknowledged High sensitivity suggest that the assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull. The lack of detailed, place-specific evaluation for key tourism-dependent communities further compounds this shortfall. Therefore, the assessment as presented

inadequately addresses the significant effects on these sensitive coastal landscapes and their associated communities.

The applicant's assessment materially underestimates the impacts on important designated landscapes and vulnerable island communities, thereby jeopardising the protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, has not been assessed despite sharing fully in the effects on that designated landscape. This small, re-establishing community depends critically on the unspoilt seascape and setting, which are at risk from the proposed development. Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed with a conclusion of small-scale change and non-significant effect. This assessment conflicts with the applicant's own recognition of the island's panoramic maritime qualities and overlooks the fact that Staffa lies beyond the 30-kilometre distance NatureScot recommended for assessing effects on National Scenic Area qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is considered of High sensitivity at 28 to 32 kilometres distance but is attributed only a Medium to Low magnitude of impact, justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga and the Garvellachs National Scenic Area at 35 to 40 kilometres, which receives the same limited assessment. Collectively, these evaluations fail to reflect the full significance of the visual and environmental effects on these designated landscapes and island communities, weakening the safeguards intended to preserve their distinctive character and vitality.

The applicant's distance-based methodology results in a systematic underestimation of significant effects on sensitive receptors situated beyond 20 kilometres from the proposed development. This approach leads to a practical consequence whereby the magnitude of change is consistently moderated and the resulting effects are discounted in the environmental impact assessment. Such treatment effectively diminishes the acknowledged impact on these receptors, despite their recognised sensitivity.

Critically, this moderation occurs without any corresponding place-based assessment for the communities living beyond the 20-kilometre threshold. These communities, which may experience genuine and substantial effects, are therefore excluded from thorough evaluation and consideration in the assessment process. This exclusion undermines the comprehensiveness and integrity of the environmental impact assessment as a whole.

Taken together, these factors demonstrate a clear and concerning pattern: wherever highly sensitive receptors exist beyond approximately 20 kilometres, the applicant's assessment systematically reduces the perceived significance of effects, while the affected communities receive no tailored or detailed appraisal. This practice not only diminishes the accuracy of the assessment but also fails to properly acknowledge and address the real impacts experienced by those communities.

1.1.58 Personal Observations

As a resident of Iona and a Community Councillor, I have had to spend weeks of voluntary time, drawing on my professional skills and experience during the busiest part of the tourism season, responding to this application because of the permanent changes it would bring to one of Scotland's most sensitive landscapes.

MachairWind would permanently industrialise the seascape surrounding Iona, Staffa, the Treshnish Isles and Mull. It would fundamentally change an internationally important cultural and natural landscape whose significance has endured for over 1,500 years because of its undeveloped character, its remoteness and the integrity of its setting.

It would expose our fragile island community to environmental, economic and social consequences that have not been properly assessed. The applicant carried out no socio-economic field research on Iona, dismissing our island and other islands as "too small a sample size", yet nevertheless draws conclusions about the effects on our community. There has likewise been no field research on these islands into the effects of living amidst development of this scale—which, if consented, would be expected to be "suitable for use in perpetuity" (NPF4 Policy 11) and would therefore permanently transform this seascape into an industrial energy landscape.

Having scrutinised the EIA in depth, I have concluded that it is not a reliable basis on which Ministers can make this decision. It repeatedly identifies major adverse, major significant and significant effects, yet consistently reaches conclusions that understate those findings, or claims compliance with statutory policy without carrying out the assessments needed to demonstrate that the relevant policy tests have been met. This is not an isolated flaw but a recurring pattern throughout the assessment, including in relation to landscape and seascape, socio-economic effects, biodiversity, climate benefit and assessment of the project as a whole.

The objections submitted by Iona, Islay and Colonsay Community Councils, together with those from the National Trust for Scotland, Hebridean Whale and Dolphin Trust and other principal objectors, independently reach the same conclusion: the applications acknowledge serious and lasting harm, but consistently understate its significance and fail to provide the standard of evidence that could justify consent.

For me, my family and my community, this proposal would permanently industrialise the place we call home. It would also fundamentally change a landscape that has been cherished, protected and handed on for generations, and which is held in trust not only for the people of Scotland but, as the international response to this proposal demonstrates, for people around the world who value Iona and its surrounding seascapes. If development of this scale is accepted here, in one of Scotland's most internationally recognised island landscapes, the protection that Scotland's planning and environmental legislation is intended to provide will have failed at the point where it should have been at its strongest.

Based on my own local knowledge, I also wish to highlight that: Every principal environmental and planning issue raised by this proposal requires substantially greater consideration. The objections submitted by Iona Community Council and the other principal objectors demonstrate, in meticulous detail, that the Environmental Impact Assessment is systematically inadequate across landscape and seascape,

biodiversity, cultural heritage, socio-economic impacts, fisheries, climate benefit, planning balance, the precautionary principle and the assessment of the project as a whole.

Finally, I would also ask the Scottish Ministers to consider: The identification of the MachairWind Plan Option in 2020 was not based on consultation with island communities to any meaningful standard, for the reasons set out in the objections submitted by Iona, Islay and Colonsay Community Councils.
I never imagined having to ask Scottish Ministers to refuse an industrial development, let alone one of this scale, in the setting of Iona. MachairWind is a proposal of exceptional scale in an area of exceptional sensitivity. It raises issues that extend well beyond this application. If Ministers conclude that industrial development of this scale is acceptable in the setting of Iona, Staffa, the Treshnish Isles and western Mull—an internationally important cultural and natural seascape currently defined by its openness, simplicity and the absence of large-scale development—then I cannot see how the protections enacted by the Scottish Parliament can provide any meaningful protection.
People across the world have taken the trouble to submit objections because Iona is not simply a place of local importance. For many, it forms part of their own cultural, historical and spiritual inheritance. Iona is also one of the places through which Scotland is recognised internationally. Your decision will therefore extend far beyond the determination of a single planning application. If consent is granted despite the applicant having failed to demonstrate that the statutory and policy tests have been met, the statutory safeguards enacted by the Scottish Parliament cease to operate as legal requirements and become matters of Ministerial discretion.

This application has prompted responses not only from local communities but from people around the world with longstanding cultural, historical and personal connections to Iona and the surrounding islands. The quality of the decision-making process, and the confidence that Ministers have fully and rigorously applied Scotland's statutory and policy framework, will therefore be of national and international significance.

1.1.59 Further Comments

I ask Ministers to read the Iona Community Council objection alongside those of the other principal objectors. Taken together, they demonstrate the applicant's failure, across every principal issue raised by these applications, to provide the evidence needed to justify consent.

1.1.60 Summary

The proposal before the Scottish Ministers has not been substantiated with sufficient evidence to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area in question. However, independent analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the mandatory heritage assessment has not been completed. Furthermore, while the effects on the island communities affected by the

development were identified, they were never subjected to proper assessment. The ecological criteria necessary for approval have not been convincingly met. Additionally, it is important to note that only a portion of the project currently lies within the remit of the Scottish Ministers.

In light of these substantial shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence application.

Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information alongside enhanced visual representations of the proposed development. It is further suggested that the applications be determined only following a full public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the final decision, it is also requested that the Ministers provide explicit conclusions within their stated reasons, particularly addressing the impacts on cultural heritage and the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 107
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced as application 00012385 under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for the development of an offshore wind generating station with an estimated capacity of approximately 2 gigawatts. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres. This site is located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and lies in proximity to the islands and coastal communities of the southern Hebrides.

The objections detailed in the following sections are grounded in both planning and environmental considerations, evaluated against the statutory and policy frameworks governing the determination of such applications. It is important to emphasise that the burden of proof lies firmly with the applicant to provide adequate and compelling evidence that all relevant statutory tests and policy requirements are met. Conversely, objectors are not obliged to substantiate contrary claims. Upon careful examination of the evidence presented, it is evident that the applicant has failed to satisfy this burden. Accordingly, the conclusion drawn is that consent for the proposed development should be withheld.

I request that this objection be formally registered and that I be kept informed of any decisions made in relation to these applications.

1.1.61 Legislative and Policy Framework

The applicant’s submission in this case fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not satisfactorily establish that these requirements have been met, nor does it provide sufficient detail on the reasonable steps proposed to mitigate adverse impacts on the identified interests.

In addition, the Scottish Ministers, as the determining authority, are themselves required to have regard to these same statutory duties when considering the application. The absence of demonstrated compliance, coupled with the presence of deficiencies and omissions in the applicant’s evidence, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent. Given the statutory importance of these duties and the applicant’s inability to adequately address them, the proposal should be refused

on the basis that it does not meet the mandatory requirements of Schedule 9 of the Electricity Act 1989.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The application has not demonstrated compliance with these policies. There are deficiencies and omissions in the evidence submitted, and conflicts with the applicable legal and policy framework remain unaddressed. In particular, the lack of sound evidence as required by GEN 19 and paragraph 4.81 undermines the statutory assessment. Furthermore, the application fails to adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. The absence of sufficient engagement in accordance with GEN 18 further compounds these shortcomings. The failure to properly consider the historic environment, landscape, natural heritage, and co-existence policies indicates a fundamental non-compliance with the National Marine Plan.

Given these unresolved deficiencies and conflicts, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established, where compliance has not been demonstrated or where evidence identifies such shortcomings, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused.

The applicant's submission is governed by the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations impose a statutory duty to assess the effects of the proposal on European protected sites in accordance with the applicable legal tests.

A detailed examination of the evidence reveals that the applicant has failed to demonstrate compliance with these statutory requirements. The Environmental Impact Assessment (EIA) submitted does not adequately identify or assess the likely significant environmental effects as required by the 2017 Regulations. Furthermore, the Habitats Regulations Assessment (HRA) is either incomplete or absent, failing to apply the necessary statutory tests to evaluate the proposal's impact on European protected sites. This omission constitutes a fundamental procedural defect and evidential shortcoming.

The absence of a robust and compliant EIA and HRA undermines the statutory framework designed to protect the environment and European designated sites.

Without these assessments, the determining authority cannot lawfully conclude that the proposal will not have adverse environmental effects or that it meets the stringent requirements of the Habitats Regulations. This failure to provide adequate environmental information and statutory assessment is a direct conflict with the applicable legal and policy framework.

In accordance with established planning principles, where compliance with environmental assessment and habitats regulations has not been demonstrated, and where deficiencies and omissions are evident, these matters must weigh heavily against the granting of consent. The applicant's failure to satisfy these fundamental legal obligations renders the proposal unacceptable in its current form.

Therefore, on the basis of the clear statutory requirements and the applicant's failure to meet them, the proposal should be refused consent due to inadequate environmental impact assessment and non-compliance with the Habitats Regulations.

There is significant uncertainty as to whether the proposal has properly considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The statutory requirement is clear that these interests must be integral to the decision-making process. However, the evidence before the determining authority does not demonstrate compliance with this obligation, leaving a critical gap in the assessment.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, such failings must weigh against the granting of consent. Given the absence of adequate consideration of island community interests in this case, the proposal fails to meet the statutory test and should therefore be refused.

1.1.62 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's support for renewable energy development. NPF4 Policy 11 expressly conditions such development on meeting impact requirements, including those related to communities under Policy 11(c), and to landscape, seascape, and other receptors under Policies 11(d) and 11(e). In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be protected, nor that island communities would be safeguarded. Additionally, the evidence submitted fails to show that the necessary ecological tests can be satisfied. These shortcomings collectively establish a clear conflict with the policy's impact criteria.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas have been protected. This practical consequence is directly at odds with the safeguards enshrined in National Planning Framework 4 (NPF4), specifically Policy 11 in

conjunction with Policies 4(c) and 4(d), which collectively aim to preserve the intrinsic value of National Scenic Areas and nationally important landscapes.

Furthermore, the application fails to demonstrate that the cultural significance of scheduled monuments and their settings would be maintained. Policies 7, including 7(h) addressing scheduled monuments and 7(c) and 7(d) concerning the setting of historic assets, impose a duty to ensure these heritage assets are protected from harm. The evidence submitted does not satisfy these requirements, nor does it confirm that the interests of island communities, integral to the local heritage and environment, would be adequately safeguarded.

In addition, the proposal does not meet the ecological standards required by Policy 3 on biodiversity. The necessary ecological tests have not been shown to be achievable based on the evidence provided. Collectively, these shortcomings illustrate that the proposal conflicts with several key NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore it cannot be supported in its current form.

1.1.63 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, relying solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern across all three assessment streams. This pattern shows that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation directly stems from the applicant's own documents, which acknowledge the influence of distance on their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis within the applicant's materials describes a High magnitude of effect within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond around 30 kilometres for some landscape types.

This approach has significant implications for the reliability of the assessment's conclusions. By systematically moderating magnitude at distances where some of the most sensitive designated landscapes are located, the protective tests applied rely on understated input values. Consequently, the conclusions drawn do not provide a robust or accurate description of the effects upon which Scottish Ministers are being asked to base their consent decisions. This methodological limitation undermines the assessment's capacity to fully capture and convey the potential landscape and visual impacts at critical receptor locations beyond the stated distance thresholds.

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible

from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area's nocturnal character during the lifetime of the project.

Furthermore, it is important to recognise that the 35-year operational period does not mitigate the policy implications of this harm. A decision to consent to this development would effectively constitute an endorsement of the seascape's suitability for wind farm use, thereby accepting the associated changes to its night-time character. This acceptance carries enduring consequences beyond the temporal span of the project, as it sets a precedent for the permissible impact on the seascape in policy terms. Consequently, the introduction of night-time lighting should be carefully considered within the broader context of seascape character and planning policy to ensure that irreversible harm is not overlooked.

The applicant acknowledges that the proposed development would result in effects engaging several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies are designed to safeguard nationally important landscapes and seascapes by ensuring that any developments do not cause unacceptable harm to these designated areas. The applicant's recognition of these policy engagements underscores the significance of the potential impacts arising from the proposal.

However, the applicant has failed to demonstrate that the conclusions reached regarding the scale of these accepted effects are consistent with the methodology it employs. Moreover, the applicant has not provided sufficient evidence to confirm compliance with the policies protecting nationally important landscapes and seascapes. This shortfall indicates a lack of robust justification for the proposal's acceptability under the relevant planning framework, thereby undermining confidence that the development would satisfactorily safeguard the identified landscape and seascape interests as required by national policy.

1.1.64 Cultural Landscape, Archaeology and Historic Environment

Compared to the recognised Historic Environment Scotland methodology, which mandates a clear evaluation of how changes to setting affect the contribution setting makes to the cultural significance of historic assets and requires an explicit assessment of whether the integrity of setting is retained, the applicant's assessment falls short. While the methodology emphasises that visual change alone should not be equated with adverse impact, it nonetheless insists on an evaluative step that goes beyond merely describing visual alterations. This step is essential to ensure that conclusions about heritage impacts are founded on a robust understanding of setting's cultural significance and integrity.

However, a Methodological Audit prepared in support of community objections has demonstrated that the applicant's operational assessment does not fulfil this requirement. Although the assessment identifies relevant heritage attributes and discusses factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been evaluated in accordance with the adopted methodology. The absence of this crucial evaluative step undermines the reliability of the applicant's

conclusions that the integrity of setting is adequately retained, thereby calling into question the overall validity of the heritage impact assessment.

The applicant's assessment fails to adequately capture the broader cultural landscape and experiential qualities that contribute to the significance of the affected heritage assets, which has practical implications for the accuracy and completeness of the heritage impact evaluation. According to the applicant's own baseline, the cultural significance of these assets is intrinsically linked to dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These include the relationships between monuments, spirituality, and the surrounding landscape and seascape, with their full value experienced through movement rather than static viewpoints. Despite this, Historic Environment Scotland's consultation responses—documented within the application—expressly requested additional viewpoints to ensure these wider qualities were properly represented, indicating that the original assessment was insufficient in scope. Therefore, without a comprehensive consideration of these experiential and relational aspects, the assessment risks underestimating the heritage impacts. It is essential that these broader cultural dimensions are fully integrated into the evaluation to provide an accurate and robust understanding of potential effects on heritage significance.

The mitigation measures proposed rely heavily on the landscape assessment, yet this assessment notably understates the extent of landscape effects. As a result, the heritage impact conclusions, which are contingent upon the landscape findings, inherit this understatement. This fundamental flaw undermines the credibility of the heritage conclusions, calling into question the adequacy of the overall mitigation strategy.

The application falls short in providing adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, the applicant has not supplied the necessary assessments or evidence demonstrating that these values will be safeguarded. This absence of detailed evaluation contrasts unfavourably with the expectations of comprehensive heritage protection embedded within the relevant policy framework.

In addition, the application does not align with the provisions of GEN 6 nor paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the need for rigorous protection of heritage assets within marine planning contexts. Given that the Scottish Ministers lack before them any conclusive assessment addressing these concerns, the proposal fails to meet key policy requirements. Consequently, the application cannot be considered acceptable in respect of heritage asset protection.

1.1.65 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic and social sustainability of the island communities by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors drawn specifically by the

landscape, seascape, cultural heritage, tranquillity, and remoteness identified in the applicant's own baseline assessments. Any alteration to these attributes will therefore have an immediate and detrimental impact on the visitor economy.

This economic impact extends beyond tourism alone; it affects the broader community infrastructure. Reduced visitor numbers would inevitably lead to diminished local services and amenities, which are maintained largely through the revenue and demand generated by tourism. Consequently, the population may decline as residents move away in search of greater opportunities and improved facilities elsewhere, threatening the long-term viability of these island communities.

In summary, the proposal risks eroding the fundamental qualities that underpin the islands' economic base and social fabric. Protecting these attributes is essential to maintaining not only tourism but also the wider community and population sustainability. Therefore, the proposal should be reconsidered in light of its potential to cause significant and lasting harm to these vulnerable island communities.

The applicant's failure to assess the habitability of the affected islands has practical consequences for understanding and mitigating impacts on island communities. Although their consultants acknowledged habitability as a potentially significant pathway of effect, no place-based assessment was conducted for these islands. Instead, the socio-economic assessment in Chapter 18 focuses on regional analysis and detailed examination of port communities, concluding—without specific evidence—that island communities are of low sensitivity to tourism effects. This approach overlooks the unique nature of small island economies, which are not average regional economies but are heavily reliant on sectors vulnerable to changes in visitor appeal. Consequently, dependence on increasing visitor numbers intensifies their sensitivity rather than diminishing it. Therefore, the conclusion of low sensitivity lacks empirical support and rests on an unsubstantiated assumption rather than robust place-based analysis.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant

planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.66 Ecology, Biodiversity and Habitats Regulations

The development area is of considerable ecological significance, encompassing Priority Marine Features and Annex I habitats within its boundaries. Furthermore, the adjacent waters provide habitat for a range of protected species, including seabirds, marine mammals, and basking sharks. This concentration of sensitive marine biodiversity underlines the environmental importance of the site and its surroundings.

The proposed development would introduce large-scale construction, operational, and decommissioning activities into this ecologically sensitive environment over a prolonged period extending to several decades. Such extensive and sustained disturbance carries the potential for significant adverse environmental effects, raising concerns about the long-term impacts on the Priority Marine Features and the protected species dependent on these habitats. Careful consideration of these factors is essential in the assessment of the proposal.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that there is an acknowledged risk of adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared for situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals that the applicant recognises potential environmental impacts that require mitigation or compensation under the derogation provisions.

The nature of these submissions indicates that the applicant is seeking to address possible harmful effects through measures aimed at compensating the guillemot population. However, it is important to note that the submission of such documentation does not represent a conclusive finding that no harm will occur; rather, it reflects a precautionary approach whereby the applicant acknowledges that the Scottish Ministers may reach a different conclusion regarding the presence or extent of adverse effects. This underscores the significance of the derogation case as a contingency within the planning process.

Consequently, the presence of these documents within the application should be regarded as a material consideration. They demonstrate the applicant's recognition of environmental sensitivities and a willingness to engage with the statutory procedures required to address potential impacts on a protected site. This approach aligns with the procedural requirements under relevant policy, but also highlights the need for careful scrutiny by decision-makers to ensure that any derogation and compensation measures are sufficient to protect the integrity of the North Colonsay and Western Cliffs Special Protection Area.

There remains significant uncertainty surrounding the applicant's ability to satisfy the statutory tests designed to protect internationally important habitats and species. The

evidence submitted, including the applicant's own derogation documents, fails to provide the necessary degree of certainty that these legal requirements can be met.

This failure to demonstrate compliance with the statutory protections fundamentally undermines the case for granting consent. Without clear assurance that internationally important ecological features will be adequately safeguarded, the application cannot lawfully proceed.

1.1.67 Cumulative and In-Combination Effects

There is significant uncertainty arising from the manner in which the current project is being assessed, as only a portion of it is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—components without which the wind farm cannot function—have been deferred to subsequent applications. This fragmented approach means that the effects of the entire project are never evaluated collectively. Instead, important elements are reserved for consideration through later consenting processes, which would occur after the principal decision has been made. Such a methodology is fundamentally at odds with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which emphasise that a project must be assessed in its entirety rather than being segmented into smaller parts whose individual impacts might appear less significant. Consequently, the current assessment framework is legally and procedurally flawed, as it prevents a comprehensive evaluation of the project's overall impacts.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. Specifically, the landscape, heritage, and socio-economic assessments underpinning the cumulative evaluation have been shown to understate the effects, as previously detailed. Consequently, the cumulative assessment is anchored to this diminished baseline, resulting in an underestimation of the combined impacts of the proposed development alongside other existing, consented, and foreseeable projects. This methodological flaw calls into question the reliability of the cumulative impact conclusions, as they do not fully capture the true extent of combined effects that would arise. Therefore, the cumulative assessment cannot be regarded as robust or comprehensive in its current form.

There remains considerable uncertainty regarding compliance with established planning policies and environmental regulations, particularly concerning the issue of project splitting. The applicant has not sufficiently demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), or the Environmental Impact Assessment Regulations. Specifically, the cumulative and in-combination effects of the proposal, as well as the overall impacts of the project, have not been reliably identified or thoroughly assessed.

This omission is significant as it undermines the integrity of the decision-making process. It is therefore essential that the treatment of any deferred works be explicitly addressed in the determination. Without such clarification, the potential environmental consequences may remain inadequately evaluated, which is contrary to the requirements of the relevant policy framework and statutory duties.

Consequently, I respectfully request that these matters be given explicit and comprehensive consideration before any approval is granted.

1.1.68 Effects on Local Area

The applicant's mitigation and compensation proposals, while addressing certain ecological concerns such as those related to the North Colonsay and Western Cliffs Special Protection Area, fall short of adequately accounting for the broader and more direct impacts on the communities of Islay, Colonsay, and Oronsay. The derogation case and compensation plan acknowledge potential harm to the internationally protected seabird populations along Colonsay's coastline, yet this represents the only clear recognition of significant adverse effects. By focusing predominantly on ecological mitigation, the application fails to extend similar rigour to the assessment of social, economic, and cultural impacts, leaving these factors insufficiently considered and underrepresented.

This underassessment is particularly evident in the treatment of Islay, Colonsay, and Oronsay as affected communities. Islay's Atlantic-facing settlements, situated immediately adjacent to the 448 square kilometre development area, receive minimal place-based evaluation of how their setting, economy, or community life might be altered by the proposals. Similarly, Oronsay Priory, a scheduled monument of national importance, lies within the zone of influence but suffers from the same deficiencies identified elsewhere in the heritage assessment, notably the neglect of its open maritime context. Taken together, these shortcomings undermine the reliability of the environmental and heritage impact evaluations and suggest that the application has not fully grasped the scope or scale of effects on these islands and their distinctive character.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility. The assessment identifies a large geographical extent of change, encompassing approximately 21 kilometres and a turbine horizon spanning around 39 degrees. Effects at the ferry crossing between Fionnphort and Iona are specifically noted, with the overall impact described as moderate and significant. Similarly, the west coast of Iona is acknowledged as highly sensitive, with widespread visibility of the turbines, and the applicant accepts that significant effects will be experienced by both residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of international heritage importance, with its significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as outlined in the applicant's own baseline studies. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits the understanding of the visual and heritage effects on key cultural receptors.

Community concerns further highlight the potential severity of the proposal's impacts. A household consultation on Iona found that 92 per cent of respondents object to the development, yet the applicant's assessment does not address habitability, despite its consultants recognising this as a potential pathway of effect on the local community. To illustrate the perceived scale, Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at around 33 kilometres, would be overtopped by the tallest turbines by approximately 194 metres, despite the turbines being located at roughly two-thirds of that distance. Taken together, these factors indicate that the visual, community, and heritage impacts on Iona have been significantly underestimated, compromising the accuracy of the overall environmental and social impact evaluation.

The applicant's assessment inadequately addresses the significant impacts on the coastal communities and landscapes of Mull and Ross of Mull, which has practical consequences for both local residents and the tourism economy. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only Medium magnitude of effect. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross. Furthermore, Fionnphort—the gateway to Iona and primary embarkation point for visitors—is identified as experiencing significant effects. This community is directly dependent on the flow of visitors, and yet no tailored, place-based assessment has been provided to reflect its unique relationship with the development.

Similarly, across Mull, significant effects are accepted by the applicant on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout at distances between approximately 21 to 33 kilometres. Despite this, the magnitude of effect is limited to Medium, which underplays the true visual and experiential impact on this nationally designated landscape. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small due solely to viewing distances exceeding 30 kilometres. Such an approach fails to adequately consider the cumulative and perceptual significance of the development in these sensitive locations.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers in its western townships—relies heavily on the intactness of the Atlantic seascape, which the proposed development would industrialise. Despite this dependency, none of these communities has been afforded a thorough, place-based assessment to understand the full extent of economic and social consequences. In sum, the applicant's evaluation does not satisfactorily capture the scale or significance of the effects on the landscapes and communities most intimately tied to these coastal and seascape environments.

The applicant's assessment overlooks significant impacts on key designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration, reliant on the

unspoilt seascape and setting that are at risk; yet, no assessment of effects on Ulva has been undertaken. Staffa, also within the same National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range recommended by NatureScot for assessment of National Scenic Area qualities. Despite acknowledging the panoramic maritime character of Staffa, the applicant concludes that effects would be small and not significant, a conclusion that appears to underestimate the island's sensitivity. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed only as having medium to low magnitude effects at 28 to 32 kilometres, based largely on distance and retained landforms, which does not fully reflect the importance of its wild character. The Scarba, Lunga and Garvellachs National Scenic Area, at 35 to 40 kilometres, is treated in the same way, further indicating a consistent underestimation of effects on these important landscapes.

The applicant's assessment notably understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an unreliable evaluation of effects. While the South Tiree coastal area is acknowledged as having High sensitivity at a distance of approximately 35 kilometres, it is paradoxically attributed a Low magnitude of change. This evaluation fails to adequately recognise the unique qualities of Tiree, an exceptionally low-lying island whose landscape character is fundamentally shaped by the dominance of sea and sky. With its highest point, Ben Hynish, reaching only 141 metres, the introduction of turbines up to 335 metres tall would create vertical elements that are unprecedented within its seascape. Given that Tiree's character is defined by an open oceanic horizon, the presence of such towering structures would represent a substantial and highly conspicuous alteration. Therefore, the conclusion of a Low magnitude of change for such an exposed and sensitive receptor exemplifies the significant understatement of effects identified in this objection.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island celebrated nationally as a symbol of island regeneration following its purchase by residents, faces the development waters directly from the east. Despite its unique social and economic context, the potential impacts on Gigha's finely balanced community and economy have not been examined, leaving a critical gap in the assessment.

Similarly, Ardnamurchan Point, the westernmost extremity of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of visual receptors that are subject to the distance-based moderation criticised in this objection. The failure to adequately assess effects on such a prominent and sensitive viewpoint undermines the comprehensiveness of the applicant's approach.

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual

and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic moderation and discounting of impacts beyond approximately 20 kilometres. This methodology directly leads to the practical consequence that significant effects on highly sensitive receptors located beyond this arbitrary boundary are understated. Consequently, the communities residing in these areas have not been subject to detailed, place-specific assessment, leaving their exposure to adverse effects effectively unrecognised in the environmental impact evaluation.

This approach is exemplified by the pattern observed in the applicant's assessment, where any encounter with sensitive receptors beyond the 20-kilometre threshold is met with an automatic reduction in the magnitude of change and a corresponding downgrading of the overall effect. Such moderation is not justified by the evidence and results in the failure to capture the true scale of environmental impacts on these distant yet vulnerable communities. The absence of a tailored, place-based evaluation means that the assessment lacks the nuance required to understand and mitigate the specific consequences experienced by those living outside the immediate vicinity.

In light of this, the environmental impact assessment as presented is fundamentally compromised. The systematic underestimation of effects beyond 20 kilometres undermines the integrity and comprehensiveness of the assessment process, thereby diminishing confidence in its conclusions. For the assessment to be robust and credible, it must incorporate a more nuanced approach that recognises and thoroughly evaluates significant effects on sensitive receptors irrespective of their distance from the development site.

1.1.69 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes as well as on the heritage and communities along this coastal region. Moreover, independent reviews of the submitted documentation reveal that the magnitude of these impacts has been underestimated, and the necessary heritage assessments have not been conducted. Although the detrimental effects on the island communities involved were identified, they remain unassessed. Additionally, the ecological criteria essential for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the overall project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to decline consent for the MachairWind Offshore Wind Farm and to refuse the accompanying marine licence. Should the Ministers be inclined to grant consent, I request that they require the provision of further environmental information and enhanced visual representations. Furthermore, I recommend that determination of the applications be

deferred until after a public inquiry, thereby ensuring a thorough examination of the concerns outlined in this objection. Regardless of the outcome, I also seek a clear and explicit statement within the Ministers' decision explaining their conclusions regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 108
Dear Sir/Madam,

I hereby lodge a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be registered accordingly, and that I receive notification of the final determination on these applications.

The proposal concerns the installation of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a defined Windfarm Development Area encompassing around 448 square kilometres of maritime space, situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. This location is in close proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the grounds for objection, grounded firmly within the relevant statutory and policy frameworks governing this planning and marine consent process. It is important to emphasise that the onus lies with the applicant to provide adequate and robust evidence demonstrating that all applicable planning and environmental tests have been satisfied. Objectors are not obliged to disprove the application. In this instance, the evidence presented by the applicant is insufficient to meet the required standards. Consequently, the applications should be refused consent.

1.1.70 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is that it systematically underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Although the methodology outlined in Appendix 16.1 does not explicitly define any distance threshold beyond which major effects cease, independent analysis based on the applicant’s own Chapter 16 and associated appendices reveals a consistent pattern: receptors more than 20 kilometres away are not assigned the highest magnitude of change, regardless of their sensitivity or the extent of visibility.

This implicit distance-based moderation is further confirmed by the applicant’s own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where

designated landscapes are located. This calls into question the reliability of the conclusions presented to the Scottish Ministers, as the methodology does not accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual evidence provided. According to this guidance, printed visualisations cannot fully replicate the scale that a viewer experiences in the field. This acknowledgement underscores that such visual materials offer only an approximation of real-world perception rather than a precise or comprehensive representation.

Furthermore, wireline drawings included within the panoramic projections share these same constraints. As technical renderings embedded within the visualisations, they do not serve as independent correctives but rather reflect the limitations of the accompanying photographic images. Consequently, while these materials assist in understanding potential visual impacts, their interpretive value must be considered within the context of these acknowledged technical and perceptual shortcomings.

The introduction of aviation and navigation lighting to a previously unlit sea horizon will result in a permanent alteration of the night-time seascape character for the duration of the proposed 35-year operational period. This change is significant, as it would transform an area currently free from artificial illumination into one marked by continuous lighting, thereby affecting the natural visual environment experienced by both residents and visitors. The impact on the seascape is not a temporary or minor inconvenience but a sustained and clearly perceptible modification that must be carefully weighed in the planning balance.

Moreover, the 35-year operational life does not diminish the policy implications of consenting to the development. Granting permission would effectively signal that this seascape is appropriate for wind farm use, setting a precedent for future decisions and potentially leading to cumulative effects on the character of the area. This recognition underscores the importance of thoroughly assessing the suitability of the seascape for such development and ensuring that any benefits are commensurate with the permanent changes imposed on the night-time environment.

The proposal's failure to adequately assess and mitigate its environmental impacts results in a clear breach of key planning policies designed to safeguard important landscape and seascape interests. This non-compliance threatens the integrity of nationally significant natural assets, undermining the practical objective of preserving these environments for current and future generations. Without a robust demonstration of policy adherence, the potential for irreversible harm remains unacceptably high.

The applicant's submission notably lacks consistency between the scale of acknowledged effects and the methodology applied to reach those conclusions. This inconsistency calls into question the reliability of the environmental assessment and weakens confidence in the proposal's capacity to address adverse impacts effectively. Consequently, the assessment falls short of the standards set by NPF4

Policies 4(c), 4(d), 11(d), 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan, which collectively establish clear expectations for protecting nationally important landscapes and seascapes.

Given these deficiencies, the proposal cannot be considered compliant with the relevant planning policies. In the absence of demonstrable adherence to these statutory requirements, the development should not be approved. Safeguarding the nation's valued environmental assets must remain paramount, and any proposal failing to meet this threshold risks causing unacceptable and potentially irreversible harm.

1.1.71 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets does not comply with the required methodology, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment fails to demonstrate this evaluative step. It is clear from the applicant's approach that visual change is described in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation; however, the methodology explicitly states that visual change should not be equated directly with adverse impact, a distinction that the assessment does not adequately address.

A Methodological Audit, relying solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not show how the integrity of setting has been evaluated against the applicant's own accepted methodology. The audit highlights that the conclusion—asserting that the integrity of setting is adequately retained—is not supported by a demonstrable evaluative process. This omission calls into question the robustness and validity of the assessment's findings on heritage impacts, thereby weakening the evidential foundation upon which the applicant's conclusions are based.

In comparing the applicant's proposed mitigation measures with the established baseline cultural significance of the heritage assets, it becomes evident that the broader experiential qualities may not be fully addressed. The baseline assessment, as recorded by the applicant, acknowledges that the cultural importance of the affected assets arises not only from their physical presence but from dynamic elements such as pilgrimage routes, arrival by sea, and movement through an active cultural landscape. This includes the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are primarily experienced in motion rather than from static viewpoints. Historic Environment Scotland's consultation responses, as documented within the application, further emphasise this point by requesting additional viewpoints to capture these wider experiential qualities more comprehensively. Taken together, this suggests that the applicant's assessment and subsequent mitigation strategies may inadequately represent the full scope of cultural significance, particularly the intangible, movement-based aspects of heritage experience. Therefore, it is essential that any further assessment or mitigation planning explicitly incorporates these dynamic

qualities to ensure a more holistic understanding and protection of the cultural landscape.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

There remains significant uncertainty regarding the application's compliance with critical policies designed to safeguard heritage assets. Specifically, the proposal engages National Planning Framework 4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of such assets. These provisions, in conjunction with Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, establish a robust framework for the protection of cultural heritage. However, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained or preserved.

This lack of a comprehensive and conclusive assessment leaves the Scottish Ministers without the necessary information to determine that the proposed development would meet the stringent requirements of the relevant policies. The absence of such a vital evaluation undermines confidence in the application's acceptability from a heritage protection standpoint. Consequently, it is submitted that the application fails to satisfy key policy obligations, warranting careful reconsideration before any approval can be granted.

1.1.72 Effects on Island Communities, Tourism and the Local Economy

There is a significant uncertainty regarding the impact of the proposed development on the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors who are attracted by specific qualities identified in the applicant's own baseline assessments, including landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these attributes could have serious repercussions.

The qualities that draw visitors are not incidental but form the core of the local economic base. Should these be compromised, the resulting decline in visitor numbers would directly threaten the provision of local services, the stability of resident populations, and ultimately the ongoing viability of these island settlements. This interdependence underscores the fragility of the communities' economic and social structures.

Given the reliance of these island communities on the very characteristics that may be affected, it is essential to consider carefully whether the proposal can be supported without undermining their sustainability. The potential consequences for both economy and community warrant a cautious and thorough evaluation before any development proceeds.

The practical consequence of the applicant's inadequate socio-economic assessment methodology is that the potential adverse impacts on island communities affected by the proposal remain insufficiently understood and unmitigated. The applicant's own consultants acknowledged habitability as a potentially significant pathway through which the development could affect these island communities. Yet, no direct assessment of the habitability of the islands likely to be impacted was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly at a regional scale, concentrating detailed analysis on port communities while neglecting a comparable place-based evaluation of the island communities themselves. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This conclusion is fundamentally flawed. Small island economies cannot be equated with regional averages; their economic structures are heavily concentrated in sectors most vulnerable to changes in the qualities that attract visitors. The islands' reliance on increasing visitor numbers does not mitigate their sensitivity to potential adverse effects; on the contrary, it intensifies their dependence on the very attributes that the proposal risks undermining. Drawing a conclusion of low sensitivity without conducting a thorough, place-specific analysis is therefore not supported by evidence but represents an unsubstantiated assumption.

In summary, the applicant's socio-economic assessment fails to provide a robust or credible understanding of the impacts on island communities. This gap undermines the reliability of the conclusions reached and leaves the risks to these vulnerable communities insufficiently addressed.

The proposal fails to meet the necessary standards for assessing and protecting island communities as required by relevant policies and statutory duties. Unlike proposals that demonstrate a precautionary approach supported by sound socio-economic evidence, this application lacks the rigorous assessment mandated by GEN 19 and paragraph 4.81 of the National Marine Plan. Furthermore, it does not comply with NPF4 Policy 11(c) or the requirements of the Islands (Scotland) Act 2018, which emphasise the importance of meaningful engagement with island communities from the inception to the conclusion of decision-making processes.

The applicant acknowledged the need for particular scrutiny of island communities but did not undertake the comprehensive evaluation necessary to understand the proposal's impacts on them. Consequently, it has not demonstrated compatibility with the sustainability of these communities, nor has it shown that the statutory duties owed to them have been fulfilled. This omission undermines confidence in the proposal's compliance with the established planning framework and statutory obligations intended to safeguard island communities.

1.1.73 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the potential ecological impacts of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the site itself. These designated features are indicative of high environmental sensitivity and conservation value, suggesting that any disturbance could have significant consequences.

Furthermore, the surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks. The introduction of extensive construction, operation, and eventual decommissioning activities over several decades raises concerns about the cumulative effects on these protected species and their habitats.

Given the scale and duration of the proposal, it is imperative to carefully assess and mitigate potential adverse environmental effects. The ecological importance of the area necessitates a precautionary approach to ensure that the natural environment is safeguarded throughout the development lifecycle.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation measures intended to offset potential adverse effects on this protected site. Such compensation plans are standard practice where direct mitigation may be insufficient to fully avoid harm.

It is important to recognise that the preparation and submission of these documents implicitly acknowledge the possibility of significant impacts on the site's integrity. The applicant's own approach concedes that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or severity of adverse effects, highlighting a degree of uncertainty surrounding the predicted outcomes.

While the presence of derogation and compensation documents demonstrates an awareness of potential impacts and a proactive approach to addressing them, the effectiveness and acceptability of these measures remain subject to further scrutiny. It is essential that any assessment carefully considers whether the proposed compensation adequately protects the guillemot population and the overall integrity of the Special Protection Area.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not alone satisfy the stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected habitats and species. The competent authority must be satisfied, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are fulfilled. This high evidential standard places the burden squarely on the applicant to demonstrate compliance, as partial or proposed measures cannot substitute for definitive proof. This legal framework is further reinforced by GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4, which collectively underscore the imperative for rigorous assessment and certainty prior to consent. Consequently, any planning decision must reflect this exacting threshold, ensuring that the statutory tests are met unequivocally before development proceeds.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion is drawn from a careful review of the evidence submitted, including the applicant's own derogation documents, which reveal the degree of uncertainty surrounding the potential impacts. Given that these statutory tests represent legal safeguards intended to prevent harm to critical ecological features, the failure to meet them fundamentally undermines the justification for granting consent. In light of this, the application does not comply with the necessary legal requirements for the protection of internationally important ecological assets and should therefore be refused.

1.1.74 Cumulative and In-Combination Effects

The evidence demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to future applications. As these elements are essential for the wind farm's operation, their exclusion from the present assessment results in the whole project's effects never being considered collectively. This fragmented approach means that significant impacts will be evaluated in subsequent consenting processes, following the principal decision, rather than in a comprehensive manner at the outset.

Such a methodology is procedurally and legally unsound, as it conflicts with the established principle upheld by the courts in Raeshaw Farms. This principle mandates that a project must be assessed in its entirety and not subdivided into smaller parts that individually appear less significant. By salami-slicing the project, the current assessment fails to provide a complete understanding of its overall environmental and planning implications, undermining the integrity of the decision-making process. Consequently, the current approach should be reconsidered to ensure a holistic evaluation of the entire project.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment fails to provide a reliable evaluation of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This deficiency arises because the cumulative assessments are inherently dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have understated the severity of effects, as previously demonstrated, the cumulative assessment inevitably adopts the same diminished baseline. As a result, the overall evaluation of combined impacts is systematically understated, leading to a misleading representation of the potential harm. Consequently, the cumulative impact assessment cannot be considered robust or dependable for decision-making purposes, as it does not accurately capture the full extent of the development's combined effects.

The failure to adequately assess the cumulative and in-combination effects of the proposed development has practical consequences for the robustness of the planning decision. Without a comprehensive evaluation of the project as a whole, including deferred works, the decision-maker cannot fully understand the environmental impacts, potentially leading to unforeseen harm and ineffective mitigation measures.

This shortfall constitutes non-compliance with established planning policies and environmental regulations. Specifically, the proposal engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations regarding project splitting. These policies and regulations require that all related works are considered collectively to ensure a reliable identification and assessment of effects.

In light of this, it is essential that the determination explicitly addresses the treatment of deferred works and their cumulative impacts. Only by doing so can the decision-making process align with statutory requirements and provide a sound basis for sustainable development.

1.1.75 Public Engagement, Site Selection and Environmental Information

The consultation process has been fundamentally compromised by deficiencies in public participation, directly impacting the legitimacy of the site-selection process. The application consists of many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are continuously engaged through the visitor season and access to specialist advice is severely limited. Meanwhile, the applicant benefited from years of preparation supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that affected communities have a realistic opportunity to engage in decisions of this scale. The conditions imposed on these communities have fallen short of that essential standard, a matter that Scottish Ministers must weigh carefully when considering the representations made.

In comparing the proposed mitigation measures with the environmental information provided, it is evident that the Environmental Impact Assessment (EIA) falls short of sufficiency required for a robust determination. While the application includes various assessments, these rely on methodologies that do not substantiate their conclusions adequately. For instance, the landscape assessment applies outcomes based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate adherence to its prescribed integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. Moreover, the application anticipates the resolution of certain significant effects through future assessments, post-consent plans, monitoring, and additional approvals, which do not fulfil the EIA Regulations' requirement that likely significant effects must be comprehensively understood prior to determination.

Consequently, the Scottish Ministers are compelled to base their decision solely on the evidence presented at the time of determination, without reliance on assumptions that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted meets the adequacy standard necessary for informed decision-making. This insufficiency undermines the integrity of the assessment and precludes the Ministers from confidently concluding that the environmental implications of the proposal have been properly identified and addressed.

1.1.76 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly considers Islay in terms of its potential as a direct project location rather than evaluating it as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area without any place-based assessment of the effects on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that defines daily life faces the development array directly, with the North Colonsay and Western Cliffs Special Protection Area forming part of Colonsay's own coastline. This area is central to the applicant's derogation case and compensation plan, reflecting an explicit acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same shortcomings identified in the heritage assessment, particularly regarding the inadequate treatment of its open maritime setting. Taken together, these omissions and underassessments undermine the reliability of the environmental and heritage impact evaluation with respect to the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

While mitigation measures are proposed, the applicant's assessment substantially underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development area and extensive visibility spanning approximately 21 kilometres. Turbines would extend across around 39 degrees of the horizon, resulting in a moderate and significant overall effect that is neither adequately addressed nor mitigated. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors across much of the island, including at Dùn Ì, its highest point. The island's internationally important monastic landscape—comprising the Abbey, the Nunnery, and high crosses—is intrinsically linked to pilgrimage and arrival by sea, yet visualisations omit key viewpoints such as from the ferry crossing and the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, as requested by Historic Environment Scotland. Community concerns are pronounced: a household consultation revealed that 92 per cent of respondents object to the proposal, and despite the applicant's consultants identifying habitability as a potential effect pathway, no assessment of this impact has been undertaken. The scale of the turbines' visual dominance can be further appreciated by comparison with Ben Hynish on Tiree, a 141-metre landmark visible from Iona at around 33 kilometres; the turbines would exceed this height by approximately 194 metres at roughly two-thirds of that distance, markedly increasing their perceived scale. Taken together, these factors demonstrate that the applicant's assessment does not fully capture the magnitude or significance of impacts on Iona, thereby undermining the accuracy and robustness of the environmental and social impact evaluation.

The applicant's assessment of the proposed development significantly underestimates the practical consequences for the coastal communities and

landscapes of Mull and the Ross of Mull, particularly in relation to their tourism economies and designated scenic areas. For example, Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors, is recognised by the applicant as experiencing significant effects. This community is directly dependent on visitor flows, yet no comprehensive, place-based assessment has been provided to address the impact on its social and economic wellbeing. Similarly, the Core Paths of the Ross of Mull and areas such as Erraid are acknowledged to be significantly affected, yet these impacts are not fully accounted for in terms of their implications for local residents and visitors alike.

Across Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres. Despite this, the magnitude of impact is only rated as Medium, a conclusion that appears inconsistent with the recognised importance of this landscape. The applicant's reliance on distance-based criteria to diminish the perceived scale of change, as seen in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further exemplifies the inadequacy of the assessment. This approach fails to capture the enduring visual and experiential harm to the landscape character and visitor appreciation that underpins the local economy.

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers in the western townships, fundamentally depends on the intactness and natural quality of the Atlantic seascape. The proposed development would industrialise this environment, yet none of these communities has been subject to a detailed, place-specific evaluation of the consequential effects. This omission undermines confidence that the applicant has fully understood or mitigated the potential for significant adverse impacts on a vital part of Mull's economy and community identity. It is therefore essential that the assessment be revisited to incorporate comprehensive, locally grounded analysis to ensure that the unique qualities of Mull and the Ross of Mull's coastal landscapes and communities are appropriately safeguarded.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the

island’s panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura’s outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant’s environmental and cultural considerations.

While mitigation measures may reduce some visual intrusion, the applicant’s assessment fundamentally understates the magnitude of change and its impact on Tiree’s landscape character. The South Tiree coastal area is categorised as having High sensitivity at approximately 35 kilometres distance, yet is assigned a Low magnitude of change. This classification conflicts with the island’s distinctive and exceptionally low-lying nature, where the entire landscape is shaped by the dominance of sea and sky. Notably, Ben Hynish, the highest point on Tiree, rises only 141 metres. The introduction of turbines reaching up to 335 metres would create vertical elements unprecedented in the island’s seascape. Given Tiree’s open oceanic horizon and sensitivity to such alterations, a Low magnitude conclusion fails to reflect the true scale of impact. Consequently, the evaluation of effects is unreliable and significantly understates the potential harm to Tiree’s sensitive and distinctive landscape character.

While the applicant’s assessment acknowledges certain visual impacts and proposes distance-based mitigation measures, these do not adequately address the effects experienced by mainland and island communities with direct views of the development. For example, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic seascapes along the Hebridean coast that attract visitors and support the local economy. The quality of these seaward panoramas is precisely the type of receptor for which the applicant’s distance-based mitigation falls short, as it fails to consider the significance of such valued views in sustaining tourism and community identity.

Moreover, the assessment omits any examination of effects on the community-owned island of Gigha, whose residents’ purchase of the island has become a national symbol of island regeneration. Facing the development waters to the east, Gigha’s delicate social and economic balance is vulnerable to unassessed impacts. Similarly, the chain of communities along the west coast of Kintyre, along with the Treshnish Isles and adjacent mainland coasts, rely heavily on the open Atlantic seascape that encompasses views towards Islay, Jura, and beyond. The absence of consideration for these interconnected seascape receptors compromises the

comprehensiveness of the assessment and risks overlooking significant adverse effects on the character and economic resilience of these communities.

There remains considerable uncertainty regarding the applicant's approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect's significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant's methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.77 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: I am deeply concerned and saddened that this environmental destruction and degradation of the landscape is even being considered. The islanders are a minority up against multinational companies armed with lawyers ready to bleed every ounce of profit out of the area. I don't believe enough people in Scotland are aware of the devastating plans and what is happening to your beautiful, wild country and habitats. Will somebody please stand up before it's too late.

1.1.78 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the requisite statutory and policy criteria governing its determination. The applicant's own evaluation acknowledges that the project would exert significant impacts on nationally designated landscapes, as well as on local communities and the coastal heritage. Furthermore, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted. The effects on the island communities within the project's area were recognised but have never undergone proper assessment. Additionally, the ecological safeguards required by law have not been demonstrated as achievable. It is also pertinent that only a portion of the entire project is currently presented for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application. Should the Ministers be inclined not to refuse consent outright, I request that they mandate the provision of further environmental information alongside enhanced visualisations. I further propose that determination of the applications be deferred until after a public inquiry, enabling a thorough

examination of the issues raised in this objection. Regardless of the decision reached, I ask that the Ministers explicitly address and record their conclusions regarding the project's effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 109
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in applications 00012385 and 00012386. These applications seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been submitted by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded and that I be kept informed of the outcome of these applications.

The proposal envisages the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. This would involve installing between 91 and 144 turbines, each with a maximum blade tip height of 335 metres. The development is planned within a designated Windfarm Development Area encompassing approximately 448 square kilometres of marine space located north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from Iona and is situated in proximity to several islands and coastal settlements within the southern Hebrides.

My objection is founded upon detailed planning and environmental considerations, examined in the context of the statutory and policy framework governing the determination of these applications. It is incumbent upon the applicant to satisfy the relevant legal and policy tests through the provision of adequate evidence. The onus does not fall upon objectors to disprove the proposal. In this instance, the applicant has failed to meet that evidential requirement. Accordingly, the applications should be refused consent.

1.1.79 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence confirms that these requirements have not been adequately addressed. The Scottish Ministers, in determining this application, are also bound to have regard to these statutory duties. Where such compliance is not demonstrated, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh decisively against the granting of consent. This application contains such deficiencies and omissions, and therefore should be refused.

The marine licence application under consideration is to be determined pursuant to Part 4 of the Marine (Scotland) Act 2010. As stipulated in the statutory framework, any authorisation decision must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan sets out a comprehensive suite of General Policies that are directly applicable to this proposal, including but not limited to GEN 4 (Co-existence), GEN 6 and

paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 regarding Cumulative Impacts. Compliance with these policies is an integral component of the statutory assessment process for the marine licence application.

Upon detailed examination of the application documentation and supporting evidence, it is apparent that compliance with the aforementioned policies has not been satisfactorily demonstrated. The application fails to provide adequate evidence to confirm that the proposal will not adversely affect the historic environment as required under GEN 6 and the associated paragraphs 4.22 to 4.23. Similarly, the assessment of impacts on landscape and national scenic areas, as mandated by GEN 7 and paragraph 4.28, is incomplete and lacks sufficient detail to ensure that these valued assets will be appropriately protected. The application also falls short in addressing the requirements of GEN 9 concerning natural heritage, with omissions in the evidence base that preclude a full understanding of potential ecological impacts.

Furthermore, the application does not meet the standards set out in GEN 18 regarding engagement, as there is insufficient demonstration of meaningful consultation with relevant stakeholders. The evidential basis for the application is deficient in accordance with GEN 19 and paragraph 4.81, where the requirement for sound evidence to underpin decision-making is not fulfilled. Finally, the application inadequately addresses cumulative impacts as required by GEN 21 and paragraph 4.85, failing to consider the broader environmental context and potential additive effects of the proposal.

Given these significant deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not satisfy the statutory requirements for marine licence determination under the Marine (Scotland) Act 2010 and the National Marine Plan. In accordance with the guidance that where compliance has not been demonstrated or where evidence identifies such shortcomings, these matters must weigh against the granting of consent, it is concluded that the marine licence application should be refused.

The applicant’s submission recognises that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), which are central to the assessment of this development. These policies set out clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy resources.

However, the evidence before the determining authority demonstrates that the proposal fails to comply with these critical policies. There is no satisfactory demonstration of compliance with Policy 3 regarding biodiversity; the application lacks adequate assessment or mitigation measures to ensure no net loss of biodiversity or enhancement of habitats. Similarly, under Policy 4, the proposal does not sufficiently address the protection of natural places, with omissions in the

evidence relating to the impact on designated natural areas and the wider landscape character. The application also falls short of the requirements of Policy 7, as it does not provide a robust evaluation of effects on historic assets and places, nor does it propose appropriate measures to conserve or enhance these heritage interests. Finally, with respect to Policy 11 on energy, the proposal does not adequately demonstrate alignment with the framework's objectives for sustainable energy use and efficiency.

Given these deficiencies, omissions, and conflicts with the applicable legal and policy framework as identified in the submitted evidence, the proposal cannot be considered compliant with NPF4. Where compliance has not been demonstrated, or where evidence reveals shortcomings, these matters weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the basis that it fails to meet the statutory and policy requirements set out in National Planning Framework 4.

The proposal fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby undermining the statutory framework designed to safeguard environmental and ecological interests. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, alongside the equivalent marine works regulations, it is a legal requirement that the likely significant environmental effects of any proposal be thoroughly identified, assessed, and reported prior to determination. This procedural safeguard ensures that decision-makers are fully informed of potential environmental consequences before consent is granted.

Furthermore, the Habitats Regulations impose a statutory duty to assess the effects of the proposal on European protected sites in accordance with the applicable legal tests. This assessment is critical to prevent adverse impacts on designated habitats and species of European importance. The evidence before the determining authority does not demonstrate compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental information provided, and the necessary assessments have not been satisfactorily completed or reported.

Given these failures, the proposal conflicts with the applicable legal and policy framework governing environmental protection and habitat conservation. The absence of adequate EIA and HRA documentation means that the statutory tests have not been met, and the potential for significant environmental harm remains unquantified and unmitigated. In accordance with established legal principles, where compliance with these requirements has not been demonstrated, such deficiencies weigh decisively against the granting of consent.

In conclusion, the proposal's failure to provide a comprehensive and compliant Environmental Impact Assessment and Habitats Regulations Assessment constitutes a fundamental procedural and substantive defect. This failure alone justifies refusal of consent, as the statutory protections designed to prevent environmental harm have not been satisfied.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental

procedural and substantive deficiency. The Act explicitly requires that the interests of island communities be taken into account and given due weight during the decision-making process. This statutory obligation is not met in the current proposal, as there is no evidence demonstrating compliance with this requirement. Furthermore, the absence of any assessment or consideration of island community interests constitutes a clear omission and conflict with the applicable legal and policy framework. Such deficiencies are material and must weigh decisively against the granting of consent. In conclusion, the proposal's failure to address the statutory duty under the Islands (Scotland) Act 2018 renders it unacceptable in planning terms.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure to meet the evidential burden is a fundamental deficiency in the application. The absence of such demonstration, coupled with identified omissions and conflicts with the applicable legal and policy framework, constitutes a clear breach of the applicant's responsibility. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's failure to satisfy the requisite legal and policy evidential standards, the application should be refused.

1.1.80 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other receptors as set out in clauses (c), (d), and (e). The proposal under consideration fails to meet these criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's environmental safeguards. Furthermore, the submission does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be effectively safeguarded from negative impacts. In addition, the ecological assessments provided are insufficient to confirm that relevant environmental protections can be achieved. Collectively, these shortcomings establish that the proposal conflicts with the impact criteria integral to NPF4 Policy 11, thereby negating its intended support for renewable energy initiatives.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that are designed to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, the proposal must be considered alongside Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3, which addresses biodiversity protection.

In the detailed assessment, it is evident that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments

and their settings would be preserved, nor that island communities would be adequately safeguarded. The evidence submitted also fails to show that the ecological tests required under the relevant policies can be met. Accordingly, the proposal conflicts with the comprehensive suite of policies intended to protect these nationally important assets, and therefore does not accord with the provisions of NPF4.

Uncertainty remains as to whether the proposal can be reconciled with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This conflict with the development plan framework is clear and extends to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome. Therefore, it must be concluded that the proposal is inconsistent with the relevant terrestrial development plan policies.

1.1.81 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. This omission undermines the reliability of the predicted effects on sensitive receptors. An independent Evidence Note, drawing exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. The applicant's own documentation further acknowledges the influence of distance in its judgements, noting for example that a coastal area more than 30 kilometres away is assessed as experiencing only a small scale of change due to viewing distance. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes leads to the application of protective tests based on understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects that the Scottish Ministers are being asked to consent to. The absence of a clear and consistent distance threshold in the assessment methodology, coupled with the implicit scaling down of impacts over distances critical to sensitive landscapes, calls into question the robustness and accuracy of the applicant's environmental effect predictions. Such methodological shortcomings must be addressed to ensure that decision-making rests on a sound and transparent evidence base.

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that stakeholders and

decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the anticipated 35-year operational period. This fundamental change to the nocturnal visual environment would be unprecedented in the area, marking a significant departure from the existing natural seascape conditions.

From a planning policy perspective, the 35-year operational lifespan does not mitigate the harm caused by this change. Consent for the development effectively signals that the seascape in question is deemed appropriate for wind farm use, with all attendant impacts on its night-time character. Therefore, the introduction of lighting must be carefully weighed against policy objectives protecting seascape quality, as the decision to permit this lighting is also a decision about the long-term character and suitability of the seascape for such development.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the adverse effects identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite acknowledging these impacts, the applicant has not demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. This lack of methodological consistency undermines confidence in the applicant's findings and, crucially, fails to establish that the proposal meets the stringent policy tests intended to protect these significant natural assets. Consequently, the proposal does not accord with the relevant policies and should be refused on the basis of non-compliance with the statutory framework protecting landscape and seascape interests.

1.1.82 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting

affect the contribution that setting makes to cultural significance and whether the integrity of setting is retained, the assessment does not demonstrate that it has undertaken this evaluative step. Instead, the assessment predominantly describes visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting is adequately retained. This approach conflates visual change with adverse impact, contrary to the methodology's explicit guidance. A Methodological Audit prepared in support of community objections, analysing the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the critical evaluation of setting integrity required by the methodology is absent from all examined examples.

The applicant's assessment acknowledges the cultural significance of the heritage assets in question, identifying key qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. These attributes highlight the experiential nature of the site, where the relationships between monuments, spirituality, and the encompassing landscape and seascape are appreciated dynamically rather than from static viewpoints. However, the mitigation measures proposed appear to focus primarily on fixed viewpoints and physical preservation, which may insufficiently address the broader cultural and experiential qualities intrinsic to the heritage assets.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this concern by requesting additional viewpoints to better represent these wider cultural and landscape qualities. Their input suggests that the current assessment might not fully capture the intangible aspects of significance that are experienced through movement and interaction with the environment. This indicates a potential shortfall in the applicant's approach, where the nuanced understanding of the heritage context could be better integrated into the evaluation and mitigation strategy.

Balancing the necessity for development with heritage conservation demands a comprehensive appreciation of both tangible and intangible values. While the applicant's baseline establishes the foundational cultural significance, the mitigation strategy would benefit from incorporating the wider experiential landscape qualities identified by Historic Environment Scotland. Doing so would ensure a more holistic preservation of the heritage's cultural significance, maintaining the integrity of the living cultural landscape that defines the site.

The applicant's evidence acknowledges that the heritage conclusions presented rely substantially on the findings of the landscape assessment. It is expressly recognised that any understatement of landscape effects, as previously identified, directly influences the accuracy and reliability of the heritage impact conclusions drawn from those findings. This interdependency signifies that deficiencies in the landscape assessment cannot be isolated but instead permeate the entire evaluation of heritage effects.

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and suggests that the overall assessment may not adequately reflect the true scale of

harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

The application fails to provide the necessary assurances that the cultural significance of internationally and nationally important heritage assets and their settings will be adequately protected. This shortcoming has a practical consequence in that it undermines the acceptability of the proposal, as the Scottish Ministers do not have before them the requisite assessment to support a conclusion that these heritage interests would be safeguarded.

This failure engages key policy provisions, notably NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to their setting. Additionally, the application must be considered in light of GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which impose clear expectations for the protection of heritage assets and their contexts.

Given that the applicant has not demonstrated compliance with these established policy requirements, the proposal cannot be considered to meet the standards necessary for approval. Consequently, the application should be regarded as deficient in its protection of heritage assets and, therefore, unacceptable in its current form.

1.1.83 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social sustainability. These visitors are drawn specifically by the qualities identified in the applicant’s own baseline studies: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Any alteration to these fundamental attributes would directly undermine the economic foundation upon which these communities depend.

Such a detrimental impact would extend beyond the immediate loss of visitor appeal. The economic consequences would inevitably affect local services, diminish the resident population, and threaten the ongoing viability of the island communities as a whole. Therefore, the proposal poses a serious risk to the essential qualities that sustain these communities and should be carefully reconsidered in light of this critical dependence.

While the applicant’s assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant’s own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their

sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

The practical consequence of the proposal's failure to adequately assess its impact on island communities is that it cannot be considered compliant with the necessary planning and statutory requirements. The applicant's acknowledgement that island communities require particular scrutiny was not followed by the comprehensive assessment needed to understand the effects on these communities. As a result, there is no evidence demonstrating that the proposal aligns with the principles of sustainable island communities.

This shortcoming is a direct breach of established policy and statutory duties. Specifically, the proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence, applying a precautionary approach where evidence is insufficient. It also involves NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and accorded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process.

In conclusion, the proposal falls short of meeting the criteria set by the relevant policies and statutory obligations designed to protect island communities. Without fulfilling these duties, the proposal cannot be regarded as acceptable in planning terms and should be reconsidered or refused to ensure the safeguarding of island communities' interests.

1.1.84 Ecology, Biodiversity and Habitats Regulations

The mitigation measures proposed for this development are insufficient when weighed against the ecological sensitivity of the site and surrounding waters. Priority Marine Features and Annex I habitats are present within the development area itself, indicating a high level of ecological importance. Furthermore, the surrounding waters serve as habitat for seabirds, marine mammals, and basking sharks, all of which are species of conservation concern. Introducing large-scale construction, operational, and decommissioning activities over several decades would inevitably cause significant adverse environmental effects. The scale and duration of the disturbance pose substantial risks to these protected species and habitats, and the proposed mitigation does not adequately address the long-term impacts on this sensitive marine environment. Given the presence of these Priority Marine Features and protected species, the development's ecological consequences must be more thoroughly accounted for and mitigated before proceeding.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgment of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it is not possible to exclude an adverse effect on the integrity of a protected site, and their inclusion in the application underscores the

applicant's recognition of this risk. Notably, the reliance on these derogation and compensation plans indicates that the applicant accepts the necessity of measures to address impacts that may arise, yet leaves open the possibility that Scottish Ministers might reach a different conclusion regarding the presence or severity of any adverse effects. This approach reflects a cautious and procedural step towards mitigation but does not in itself resolve the question of whether significant effects on the protected site can be avoided.

The applicant's evidence confirms that, under the Habitats Regulations, planning consent may only be granted if the competent authority is satisfied that the proposed development will not adversely affect the integrity of the protected site, except where the stringent derogation tests are fully met. This legal framework demands that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate this compliance lies squarely with the applicant. Furthermore, proposals relying solely on mitigation, compensation measures, or future monitoring cannot, in isolation, satisfy the statutory requirements. This rigorous evidential standard is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Taken together, these legal and policy mandates set a high threshold for consent, ensuring that developments affecting protected habitats and species are subject to thorough scientific scrutiny before approval is granted.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion is drawn from a careful review of the evidence submitted, including the applicant's own derogation documents, which reveal the degree of uncertainty surrounding the potential impacts. Given that these statutory tests represent legal safeguards intended to prevent harm to critical ecological features, the failure to meet them fundamentally undermines the justification for granting consent. In light of this, the application does not comply with the necessary legal requirements for the protection of internationally important ecological assets and should therefore be refused.

1.1.85 Cumulative and In-Combination Effects

The current assessment of the proposed development is fundamentally incomplete, as it addresses only a portion of the project before the Scottish Ministers. Critical components such as the export cable corridor and the onshore transmission works, which are indispensable for the operation of the wind farm, have been deferred to separate, subsequent applications. This fragmentation means that the cumulative effects of the entire project are never considered collectively, resulting in a piecemeal evaluation that overlooks the full scope of potential impacts.

Such an approach conflicts with established legal principles, notably the precedent set in Raeshaw Farms, which underscores the necessity for projects to be assessed in their entirety rather than segmented into smaller parts to downplay their individual effects. By deferring significant elements to later consenting processes after the primary decision has been made, the assessment procedure fails to provide a comprehensive and coherent basis for decision-making, thereby undermining the integrity of the planning process.

The cumulative impact assessment relies directly on the findings presented in the Environmental Impact Assessment, which itself contains understated effects within the landscape, heritage, and socio-economic evaluations. As a result, the baseline from which cumulative effects are measured is inherently reduced, leading to an underestimation of the true combined impact of the proposed development alongside existing, consented, and foreseeable projects. This flawed approach undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential adverse effects when considered collectively.

The failure to adequately address project splitting and cumulative effects in the current proposal poses a significant risk to the integrity of the environmental assessment and subsequent planning decisions. Without a reliable identification and assessment of the cumulative and in-combination effects, as well as the overall impact of the project including deferred works, there is a practical danger that adverse environmental consequences may be overlooked. This omission undermines the robustness of the decision-making process and could lead to approval of development that does not fully comply with established policy and regulatory frameworks.

The applicant's submission does not satisfy the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it comply with NPF4 Policy 11(e). Furthermore, it fails to meet the standards mandated by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. These policies and regulations exist to ensure that all elements of a development are considered collectively, thereby providing a comprehensive understanding of the potential environmental effects. The absence of such an approach here means that the cumulative impacts, including those arising from deferred components of the project, remain unquantified and unmitigated.

In light of these concerns, it is imperative that the planning authority requires explicit consideration of the deferred works as part of the overall project assessment before any determination is made. This will ensure compliance with the relevant policy and regulatory requirements and promote a thorough and transparent evaluation of all potential effects. Only through such rigorous scrutiny can the planning process uphold environmental protection standards and deliver sustainable outcomes.

1.1.86 Public Engagement, Site Selection and Environmental Information

The applicant's submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant's advantage, having had years to prepare the case with considerable professional and

financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The environmental information presented within the application falls short of the standards required for a thorough Environmental Impact Assessment (EIA), particularly when compared to the robust evidence necessary to inform Scottish Ministers' decisions effectively. While the application does identify potential pathways to significant effects across various topics, it either fails to investigate these pathways comprehensively or relies upon methodologies that lack the rigor to substantiate the conclusions reached. For example, the landscape assessment produces outcomes based on a distance pattern absent from its own methodology, the heritage assessment does not evidence the application of its prescribed integrity test, and the socio-economic assessment omits a place-based analysis of the affected islands. Such deficiencies undermine the reliability of the environmental evidence and distinguish it unfavourably from the standards of sufficiency required by the EIA Regulations.

Furthermore, the application frequently depends on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals to address outstanding environmental concerns. This approach is incompatible with the fundamental requirement that likely significant effects must be understood before determination, as prescribed by the EIA Regulations. Scottish Ministers are obliged to base their decisions on the evidence currently before them rather than on speculative assurances that unresolved matters will be satisfactorily addressed in the future. Given that the applicant has not demonstrated that the environmental information submitted is adequate for this purpose, it follows that the EIA as presented is insufficient to support an informed and lawful determination of the application.

1.1.87 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and

economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This acknowledgement implicitly concedes that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

The practical consequence of the applicant's assessment is a significant underestimation of the visual, community, and heritage impacts on Iona, which undermines the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would extend across around 39 degrees of the horizon, notably affecting the ferry crossing between Fionnphort and Iona. Such a scale of visual intrusion cannot be regarded as minor or negligible.

Furthermore, the West Coast of Iona is similarly characterised by high sensitivity and widespread visibility, with the applicant acknowledging significant effects on residents and visitors, including at Dùn Ì, the island's highest point. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors clearly impacted by the proposed development. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby omitting critical perspectives.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona found that 92 per cent of respondents object to the proposal, yet habitability—a pathway of potential effect identified by the applicant's own consultants—was never properly assessed. The perceived scale of the turbines is stark when compared to familiar landmarks: Ben Hynish on Tiree, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres, at roughly two-thirds of that distance. This comparison underscores the overwhelming visual presence the turbines would have. Taken together, these factors demonstrate that the applicant's evaluation fails to adequately capture the scale and significance of the impacts on Iona, thereby compromising the integrity of the environmental and social impact assessment.

The applicant's assessment recognises significant effects on various parts of Mull and the Ross of Mull coastal communities, notably acknowledging high sensitivity in the Ross of Mull South coastal area at distances of approximately 22 to 24 kilometres with a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross. Importantly, Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—is identified as experiencing significant effects, reflecting its direct connection to visitor flows. Similarly, significant impacts are noted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as on the Loch na Keal National Scenic Area, which is of high sensitivity throughout a range of 21 to 33 kilometres, though the magnitude attributed does not exceed medium.

However, the applicant's methodology relies heavily on distance as a determinant of impact, as illustrated by the assessment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, exemplifying the distance-based reasoning that this objection challenges. This approach risks underestimating the true significance of visual and experiential effects on sensitive landscapes and communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

Moreover, the assessment does not adequately address the economic and community implications for Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers reliant on the integrity of the Atlantic seascape. This seascape faces potential industrialisation from the proposed development, yet none of these coastal communities has been subject to a detailed, place-based evaluation. Without such focused consideration, the full extent of adverse effects on tourism-dependent economies and community cohesion remains insufficiently understood.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments

fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite acknowledging its High sensitivity at a distance of approximately 35 kilometres. This conclusion contrasts sharply with the recognised sensitivity of the site, suggesting that the proposed mitigation measures or distance-related factors may have been overestimated in their effectiveness. When compared with other assessments where similar distances and sensitivities have resulted in higher magnitude ratings, this discrepancy indicates an inconsistency that undermines the reliability of the applicant's evaluation.

Tiree's unique topography and landscape character further challenge the Low magnitude conclusion. As an exceptionally low-lying island dominated by expansive sea and sky, its highest elevation, Ben Hynish, reaches only 141 metres. The introduction of turbines up to 335 metres tall would represent vertical structures unprecedented in the island's seascape. Such prominent features would inevitably alter the visual and experiential qualities that define Tiree's character. The assessment's failure to adequately reflect this substantial alteration leads to a significant understatement of potential effects.

In light of these considerations, the applicant's evaluation appears to underestimate the magnitude of change and consequent impacts on Tiree's sensitive and distinctive landscape. This understatement raises concerns about the overall reliability of the assessment, warranting a more thorough and calibrated appraisal to ensure that the full extent of effects on this exposed and valued receptor is properly recognised and addressed.

The applicant's failure to assess the effects of the proposed development on mainland and island communities such as Gigha, Ardnamurchan Point, and the west coast of Kintyre has practical consequences that undermine the thoroughness of the environmental assessment. Gigha, a community-owned island renowned nationally for its regeneration, faces the development site from the east; yet, no examination has been undertaken regarding how the project might impact its delicate community balance and local economy. Similarly, Ardnamurchan Point, the most westerly tip of the British mainland, offers panoramic views along the Hebridean seaboard that are a significant draw for visitors to the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation applied in the applicant's assessment, meaning that potentially significant visual and economic effects have been overlooked.

Furthermore, the chain of communities along Kintyre's west coast depends heavily on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which shapes their character and supports their visitor economies. This reliance extends to the Treshnish Isles and other small islands and mainland coasts with views towards the development area, all of which share a similar sensitivity to changes in the seascape. By omitting these receptors from the assessment, the applicant's evaluation fails to capture the full scope of socio-economic and visual impacts, thereby compromising the comprehensiveness and reliability of the

conclusions drawn. In light of these omissions, the application should be reconsidered with a more inclusive and detailed assessment of effects on these communities to ensure informed decision-making.

The applicant's environmental impact assessment systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors located beyond approximately 20 kilometres from the development site. This approach results in a quantified underestimation of significant effects on these receptors. Detailed analysis reveals that, in every instance where the assessment encounters such receptors at this distance, the reported magnitude of change is reduced, and consequently, the overall effect is diminished in the appraisal. Moreover, the communities residing within these areas have been deprived of any place-based assessment, leaving their specific circumstances and vulnerabilities unexamined. This methodological limitation undermines the integrity and comprehensiveness of the environmental impact assessment, as it fails to accurately reflect the real extent of impacts on distant yet sensitive communities. In conclusion, the reliance on a distance-based threshold of approximately 20 kilometres leads to a systematic discounting of significant effects, which is neither justified nor appropriate for a robust evaluation of environmental consequences.

1.1.88 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The cultural and ecological heritage of these islands should not be sacrificed just at a time when their infrastructure needs these qualities the most.

1.1.89 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, independent evaluations of the submitted documentation reveal an understatement of these impacts and highlight the absence of the necessary heritage assessment. Furthermore, while the effects on the island communities affected by the development were identified, they have never undergone a thorough assessment. The ecological requirements have not been convincingly satisfied, and it should be noted that the Scottish Ministers are being asked to consider only a portion of the entire project.

Given these deficiencies, I respectfully urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm and the related marine licence. Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visual representations of the project. Moreover, I contend that determination of the applications should be deferred until a public inquiry is convened, allowing for a comprehensive examination of the issues raised in this objection. Regardless of the final decision, I respectfully seek that the Ministers provide clear and explicit conclusions within their reasoning concerning the impacts on cultural heritage and the communities residing on the affected islands.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 110
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm, which is currently under consideration through application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, operating as ScottishPower Renewables. I request that this correspondence be recognised as an official objection, that I am recorded as an objector, and that I receive notification of the final determination relating to these proposals.

The project in question involves the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It is proposed to include between 91 and 144 wind turbines, each potentially reaching a maximum height of 335 metres to blade tip. The designated Windfarm Development Area spans roughly 448 square kilometres of marine environment situated north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona. This location lies in proximity to various islands and coastal settlements within the southern Hebrides.

The following sections articulate the grounds for objection, grounded firmly in the relevant statutory and policy framework that governs the assessment and determination of these applications. It is imperative to emphasise that the onus lies with the applicant to substantiate, by means of adequate and robust evidence, that all applicable statutory tests and policy requirements have been met. Objectors are not obliged to demonstrate the contrary. Upon careful examination of the evidence presented, it is clear that the applicant has failed to satisfy the requisite burden of proof. Consequently, I contend that consent for the MachairWind Offshore Wind Farm should be withheld.

1.1.90 Legislative and Policy Framework

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby rendering the proposal unacceptable for consent. Authorisation decisions must be taken in strict accordance with the National Marine Plan unless relevant considerations indicate otherwise. In this case, the application does not demonstrate compliance with multiple General Policies that are integral to the statutory assessment process.

Specifically, the application lacks sufficient evidence to confirm adherence to GEN 4 (Co-existence), which requires careful consideration of the interaction between marine users and activities. There is no adequate demonstration that the proposal will coexist sustainably with existing marine uses. Furthermore, the application fails to meet the requirements of GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment. The absence of robust assessment or mitigation measures for potential impacts on historic marine assets constitutes a significant omission.

Similarly, the application does not satisfy GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas. The proposal’s effects on these sensitive

areas have not been properly evaluated or addressed. The failure to comply with GEN 9 (Natural Heritage) is also evident, as the application does not provide convincing evidence that natural heritage interests will be protected or enhanced, contrary to the policy's objectives.

Engagement requirements under GEN 13 and GEN 18 have not been adequately fulfilled, undermining the transparency and inclusivity expected in the decision-making process. The application also falls short of the standards set by GEN 19 and paragraph 4.81 concerning Sound Evidence. The evidence submitted is insufficiently robust, lacking the necessary detail and reliability to support the application's claims. Lastly, the application does not properly address GEN 21 and paragraph 4.85 on Cumulative Impacts, failing to consider the combined effects of this proposal alongside other existing or planned marine activities.

Given these multiple deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan. As established by the statutory assessment process, where compliance has not been demonstrated, these matters weigh decisively against the granting of consent.

In conclusion, the marine licence application is fundamentally flawed in its failure to comply with the statutory requirements and relevant National Marine Plan policies. This non-compliance constitutes a clear and substantive basis for refusal of the marine licence.

The proposal fails to provide the necessary Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of any proposal be identified, assessed, and reported prior to determination. This essential process has not been adequately fulfilled in the current submission.

Furthermore, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the relevant statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. There are clear deficiencies and omissions in the assessments provided, which conflict with the applicable legal and policy framework.

Given these failures to meet the mandatory procedural and substantive standards for environmental and habitats assessment, the proposal does not satisfy the statutory tests necessary for lawful consent. Consequently, these shortcomings must weigh decisively against the granting of planning permission.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement is clear that decision-making must explicitly address and give due weight to the unique needs and circumstances of island populations. The absence of such consideration

undermines the integrity of the planning process and the legitimacy of any consent granted.

The submitted evidence does not demonstrate compliance with this legal obligation. There are identifiable deficiencies and omissions in the assessment of the proposal's impact on island communities, indicating a failure to meet the statutory standard. This lack of proper evaluation conflicts directly with the applicable legal and policy framework established by the Islands (Scotland) Act 2018.

Given these shortcomings, the proposal cannot be regarded as compliant with the statutory duty to consider island communities' interests. As established by the evidence, where such compliance is not demonstrated, these failures weigh decisively against the granting of planning consent. Accordingly, the application should be refused on this basis.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is an established principle that the onus lies squarely with the applicant to provide clear and comprehensive proof that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence falls short of meeting this evidential burden.

The absence of such demonstrable compliance is not a mere procedural oversight but a substantive deficiency that directly undermines the legitimacy of the application. Where the applicant has not shown, beyond doubt, that all legal and policy frameworks have been adhered to, the planning authority must regard these shortcomings as material considerations weighing decisively against the grant of consent. The evidence presented does not dispel uncertainties nor address omissions; rather, it highlights conflicts with the established statutory and policy regime.

Given these failures, the application cannot be considered to have met the necessary legal and policy thresholds. The lack of adequate evidence to prove compliance constitutes a clear and compelling reason to refuse planning permission. In conclusion, the applicant's inability to satisfy the evidential requirements mandated by law and policy renders the proposal unacceptable and justifies its rejection.

1.1.91 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a clear distance threshold for ceasing major effects, yet evidence indicates that no highly sensitive receptor beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of sensitivity or visibility. Their own documents acknowledge distance as a key factor: areas over 30 kilometres away are judged to experience only small-scale change, with high magnitude effects confined to within about 20 kilometres, medium effects between 20 and 30 kilometres, and low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes are located results in understated

inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

While mitigation measures aim to reduce visual impacts, it is important to recognise that the visualisation materials underpinning the assessment have inherent limitations that constrain their effectiveness. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully convey the scale perceived by a viewer in situ. Furthermore, the wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings dependent on the photographic base rather than serving as independent corrections. Consequently, reliance on these visualisations may underestimate the true visual effects experienced on site.

While the introduction of aviation and navigation lighting is a necessary safety measure, it inevitably alters the character of the currently unlit night-time seascape. This permanent change, lasting for the proposed 35-year operational life of the development, represents a significant and unavoidable impact. Although the operational lifespan may suggest a temporal limitation, policy considerations do not regard this as a mitigating factor; consenting to the development effectively endorses the suitability of this seascape for wind farm use. Therefore, the lighting effects must be weighed carefully against the seascape's existing character and the broader policy framework before any approval is granted.

There remains significant uncertainty regarding the assessment of the proposal's effects on landscape and seascape interests. The applicant has failed to adequately demonstrate that its conclusions on the scale of these effects align with the methodology it has employed. This raises questions about the reliability of the impact evaluation and undermines confidence in the overall assessment.

Moreover, this lack of clarity has direct implications for compliance with established planning policies. The proposal does not satisfy the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, all of which are designed to safeguard nationally important landscapes and seascapes. Without clear evidence of adherence to these policies, the proposal cannot be considered consistent with the statutory framework protecting these valued environments.

1.1.92 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate that the integrity of setting for historic assets has been properly evaluated, undermining confidence in its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's established methodology—which mandates an evaluation of whether changes to setting affect its contribution to cultural significance and whether setting integrity is maintained—the assessment relies predominantly on descriptions of visual change rather than the required evaluative analysis. A Methodological Audit, conducted using the applicant's own Appendix 14.3, reveals that while heritage attributes are identified and factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation are discussed, the critical step of assessing the integrity of setting in accordance with the accepted

methodology is absent. This omission means that the conclusion asserting adequate retention of setting integrity is unsupported by the necessary methodological rigor, calling into question the reliability of the applicant's heritage impact findings.

The applicant's assessment acknowledges the cultural significance of the heritage assets primarily through qualities such as pilgrimage, arrival by sea, movement within a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape. Notably, these attributes are experienced through dynamic movement rather than static viewpoints. While this recognition is a positive step towards understanding the heritage value, the assessment may not fully capture the experiential qualities that contribute to the broader cultural landscape.

Historic Environment Scotland, in their consultation responses included within the application, highlighted this potential shortcoming by requesting additional viewpoints. Their concern was that the current assessment might inadequately represent these wider qualities, which are essential to appreciating the heritage assets in their full context. This suggests a need for a more comprehensive approach that goes beyond fixed observation points to encompass the cultural narratives conveyed through movement and the relationships between elements in the landscape.

Given the importance of these experiential and relational qualities, it is essential that the assessment methodology and any proposed mitigation measures reflect this complexity. Without a thorough representation of the cultural landscape's dynamic nature, there is a risk that the heritage impacts may be underestimated. Therefore, further consideration should be given to incorporating these wider qualities to ensure that the cultural significance of the affected assets is fully and appropriately addressed.

The deficiencies in the landscape assessment have a direct and practical consequence: they undermine the credibility of the heritage impact conclusions. This is because the heritage conclusions rely heavily on the findings of the landscape assessment. Where the landscape effects have been understated, as previously outlined, the heritage conclusions that are built upon this assessment necessarily inherit the same understatement. Consequently, any evaluation of heritage impacts based on these flawed landscape assessments cannot be considered robust or reliable. Therefore, the heritage impact conclusions should be treated with caution, given their dependence on an inadequate landscape assessment.

The applicant's submission fails to demonstrate compliance with key heritage protection policies, notably NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the cultural significance of internationally and nationally important heritage assets and their settings has not been adequately assessed or shown to be protected. Consequently, the Scottish Ministers do not have before them the necessary assessment to support a conclusion that these heritage assets would be safeguarded, undermining the acceptability of the application.

1.1.93 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, whose presence underpins the local economy and social fabric. These visitors are attracted specifically by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic foundations of these communities. This, in turn, would jeopardise the provision of essential services, threaten population stability and ultimately compromise the long-term viability of the island settlements.

The applicant's socio-economic assessment methodology falls short when compared to the detailed place-based analyses typically employed to understand and mitigate impacts on island communities. While the assessment in Chapter 18 provides a thorough examination of potential port communities, it neglects to apply an equivalent level of scrutiny to the island communities directly facing the development. Notably, the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, yet no specific assessment of island habitability was undertaken. Despite this, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a finding that lacks the rigour of place-based evidence.

This conclusion fails to recognise that small island economies differ markedly from regional averages. Their economic structures are often concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Dependence on rising visitor numbers does not mitigate this vulnerability; rather, it intensifies the community's reliance on the very attributes that may be compromised by the development. Therefore, the assertion of low sensitivity, made without detailed, location-specific analysis, amounts to an unfounded assumption rather than an evidence-based judgment. Such methodological inadequacy undermines the reliability of the assessment and diminishes confidence in the adequacy of proposed mitigation measures for island communities.

The applicant's evidence acknowledges that island communities necessitate particular scrutiny in the planning process, yet it concedes a failure to undertake the comprehensive assessment required to understand the proposal's effects upon these communities. This omission is significant given that the decision-making framework engages GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence. Where such evidence is lacking, a precautionary approach is explicitly required. Moreover, the proposal must accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which impose a statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the earliest stages to the conclusion of the decision-making process.

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island

stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.94 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The inclusion of these documents demonstrates a clear recognition by the applicant of the potential for negative impacts arising from the proposed development, indicating a proactive approach to mitigating those impacts within the framework of derogation provisions.

Importantly, the submission of these documents constitutes a significant element of the application. It signals that, according to the applicant’s own assessment, there remains uncertainty as to whether the Scottish Ministers will concur with the conclusion that no adverse effect will occur. This acknowledgment underscores the gravity of the potential impacts on the protected site and the necessity of considering appropriate compensatory measures. Therefore, while the applicant has taken steps to address the issue, the presence of these derogation and compensation documents highlights the need for careful scrutiny of the application’s implications for the North Colonsay and Western Cliffs Special Protection Area before any final decision is made.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied

beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The assessment of the submitted evidence, notably the applicant's own derogation documents, clearly indicates a failure to satisfy the statutory tests designed to protect internationally important habitats and species. The information provided does not demonstrate the requisite degree of certainty that these legal requirements can be met. Consequently, this shortfall fundamentally undermines the justification for granting consent in this instance.

1.1.95 Cumulative and In-Combination Effects

The current assessment process is fundamentally flawed as it considers only a portion of the project before the Scottish Ministers, specifically excluding the export cable corridor and onshore transmission works. These components are essential for the operation of the wind farm but are deferred to later applications. Consequently, the cumulative effects of the entire project are never evaluated together, resulting in an incomplete and fragmented assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts with individually diminished impacts. By deferring significant elements to subsequent consenting processes after the principal decision, the assessment undermines both procedural integrity and comprehensive environmental evaluation.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. Specifically, the landscape, heritage, and socio-economic assessments underpinning the cumulative evaluation have been shown to understate the effects, as previously detailed. Consequently, the cumulative assessment is anchored to this diminished baseline, resulting in an underestimation of the combined impacts of the proposed development alongside other existing, consented, and foreseeable projects. This methodological flaw calls into question the reliability of the cumulative impact conclusions, as they do not fully capture the true extent of combined effects that would arise. Therefore, the cumulative assessment cannot be regarded as robust or comprehensive in its current form.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including deferred works, have been reliably identified and assessed as required by policy and regulation. This omission is in direct conflict with the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), which collectively mandate comprehensive consideration

of all project components to prevent project splitting. The Environmental Impact Assessment Regulations further reinforce this requirement, underscoring the necessity of a holistic appraisal of the project's environmental implications.

The absence of explicit treatment of the deferred works within the application undermines the integrity of the assessment process and risks overlooking significant environmental impacts that may arise cumulatively or in combination with other activities. Such an approach is inconsistent with established planning policy and statutory obligations designed to ensure that decision-making is informed by a complete and accurate understanding of all relevant effects. Without addressing this gap, the assessment remains incomplete and cannot be considered compliant with the requisite standards.

Accordingly, it is essential that the decision-making process expressly incorporates an evaluation of the deferred works and their potential cumulative effects. Only then can the application be properly assessed in line with GEN 21, the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. In the absence of such consideration, the proposal does not meet fundamental policy and regulatory requirements, and consent should not be granted.

1.1.96 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation during the site-selection and application stages is a significant undermining of the legitimacy of the entire process. The applicant requests that Scottish Ministers place substantial weight on the site-selection process; however, the quality of public involvement in that process is directly relevant and, regrettably, deficient. The consultation materials encompass many thousands of pages of technical information, and the consultation period coincided with the busiest months for island communities—when residents are engaged continuously in the visitor season and access to specialist advice is limited—while the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

The National Marine Plan's GEN 18 policy, together with the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected by decisions of this scale must be afforded a realistic and meaningful opportunity to engage. In this instance, the conditions imposed on the local communities fall short of this standard. The timing and volume of material provided, coupled with the seasonal pressures on the population, have constrained the ability of those most impacted to participate effectively.

In light of these shortcomings, it is essential that Scottish Ministers carefully consider the reduced quality of public engagement when weighing the representations received. The integrity of the decision-making process depends on ensuring that affected communities have genuinely had the opportunity to contribute, a condition that has not been met in this case.

The Environmental Impact Assessment provided in this application fails to offer sufficient evidence to enable the Scottish Ministers to make a fully informed determination. Key topics within the assessment reveal significant shortcomings: the

landscape assessment produces outcomes based on a distance pattern not supported by its own stated methodology; the heritage assessment does not substantiate the application of its declared integrity test; and the socio-economic assessment lacks a place-based analysis of the affected islands. Furthermore, the application relies on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which contravenes the requirement under the EIA Regulations that likely significant effects must be comprehensively understood prior to determination. Given these deficiencies, it is clear that the environmental information submitted is inadequate for the Scottish Ministers to properly evaluate the likely impacts of the development. Therefore, the application should not be approved on the basis of the current Environmental Impact Assessment.

1.1.97 Effects on Local Area

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the development area spanning approximately 21 kilometres and turbines extending across about 39 degrees of the horizon. This results in a moderate and significant overall effect that directly affects the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, Nunnery, and high crosses, is central to its cultural significance. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional visual viewpoints—specifically from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn—remains unfulfilled, with no visualisation provided from these critical perspectives. This omission undermines a comprehensive understanding of the heritage impact, failing to fully represent the development's intrusion into this highly sensitive setting.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's consultants did not assess habitability, despite identifying it as a potential pathway of effect. The perceived scale of the turbines can be better appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would exceed Ben Hynish by around 194 metres while situated at roughly two-thirds of that distance, highlighting the disproportionate visual intrusion. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the true extent of impacts on Iona, warranting a more rigorous and comprehensive reassessment.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to

24 kilometres, and attributes these effects a Medium magnitude. Specifically, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment significantly underestimates the impacts of the proposed development on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this deficiency. As a community-owned island in the early stages of regeneration, Ulva depends critically on the very qualities of setting and unspoilt seascape that the development threatens. Yet, the applicant has failed to conduct any assessment of effects on this small, re-establishing community. This omission neglects the practical consequence that the island's recovery and sustainability hinge upon preserving its natural environment.

Similarly, Staffa—also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands—lies approximately 35 kilometres from the development area. This distance exceeds the approximately 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite Staffa's recognised panoramic maritime qualities, which the applicant's own assessment accepts, the conclusion drawn is that the scale of change would be small and the effect not significant. This downplaying fails to acknowledge the intrinsic value of Staffa's seascape and the potential for cumulative or indirect impacts beyond the arbitrarily limited assessment radius.

Further afield, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed as having High sensitivity but is attributed only a Medium to Low magnitude of impact. The moderation of effect is justified by distance, apparent scale, and retained landforms, notwithstanding that the area's designation fundamentally rests on its wild, undeveloped Atlantic outlook.

This rationale inadequately captures the potential erosion of the very qualities that justify the designation, thus weakening the protection afforded to this landscape.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, at around 35 to 40 kilometres distance, where the assessment similarly downplays magnitude and significance.

In conclusion, the applicant's limited spatial scope and the underestimation of both direct and indirect effects result in a material underassessment of impacts on designated seaboard landscapes and island communities. This undermines the statutory purpose of protecting their natural and cultural qualities and fails to provide the necessary evidence to ensure informed decision-making that safeguards these vulnerable areas.

The applicant's assessment acknowledges the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes the magnitude of change to be Low. This characterisation forms the basis for the evaluation of effects on Tiree's landscape. However, the assessment's attribution of Low magnitude appears inconsistent with the island's intrinsic landscape qualities.

Tiree is an exceptionally low-lying island, with its entire landscape character defined by the dominance of sea and sky. The island's highest point, Ben Hynish, reaches only 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height represents the insertion of vertical structures without precedent in Tiree's seascape. Such a scale of development would be a dominant and alien feature on an otherwise open oceanic horizon.

Consequently, the conclusion of Low magnitude change for a receptor of such exposure and sensitivity seems to significantly understate the likely effects. This understatement leads to an unreliable evaluation of the landscape impacts on Tiree, and warrants careful reconsideration to more accurately reflect the scale of visual and character change that would result.

There remains considerable uncertainty regarding the applicant's approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect's significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant's methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.98 Personal Observations

In addition to the planning matters above, I am personally concerned because: The view from my house window in Iona, is one that inspired the Scottish Colourists, a principal Scottish art movement. Samuel Peploe and John Cadell, returned to Iona again and again to immerse themselves in the natural views and wildlife found in Iona. .

For the same reasons as Peploe and Cadell, vast numbers of people - with Iona alone attracting a quarter of million people annually, are attracted to the Inner Hebrides and Argyll for its sailing, seascapes and history. As far as I'm aware no survey has been conducted of tourists visiting from home and abroad as to whether it would change their feelings about visiting an industrialised Inner Hebrides. Visit Scotland and numerous social media posts laud the unspoilt views and natural history of the Inner Hebrides. Something that supports unquantified jobs in hospitality, tourism, science and conservation.

The natural environment and its ecosystems are both precious and fragile. Once it's gone it's gone. Extinct. The consequences of this eventuality will not be cared about by any of the beneficiaries Machair Wind.

Having been absent for decades, Humpback whales are only just returning to the Inner Hebrides. The devastating environmental consequences of mink farming for the fashion industry are still being felt today. Reversing environmental damage has no guarantees and can take generations and more often than not those that caused the damage won't pick up the costs. Most likely dedicated volunteers and local communities doing the hard work without financial support.

The corncrake is a species on the brink. Once common throughout the UK, the extant UK population is only found in the Hebrides. Annually, a huge amount of research and effort goes into trying to increase their numbers. Their sound is iconic for Hebridean summers and each year they attract numerous wildlife enthusiasts eager for a glimpse of this iconic bird.

According to Nature Scot, Scotlands seabirds are declining year on year. They give a host of explanations, such as Bird Flu and climate change. Are those purporting to act for the benefit of Scotland to allow foreign multinationals to add ndustrialisation of an unspoilt, virgin landscape to the list?

Scotland already produces enough power for itself, even though it pays the highest energy bills in the United Kingdom. It is not lost on me that the explosion in wind farms coincides with the explosion in data bank construction applications. We are not talking about empowering local Hebridean communities with local energy generation. We are talking about a foreign multinational extracting profit for itself out of Scotland.

The sum of money being offered to buy off those affected communities is offensive. They should offering shares and dividends to those communities, given those communities are facing financial loss in industries such as tourism. Not a punitive financial recompense that has not been explained how it will be divided or allocated.

Amongst the things the Ross of Mull and Iona needs are road and ferry improvements, social housing, medical and care improvements, sustainable jobs and cheap sustainable electricity.

Like water, energy is fundamental for life in the modern world. Energy should be nationalised just like Scotland's water. Scotlands energy for the benefit of Scotlands people. The consultation for Machair Windfarm is about whether foreign interests should be allowed to profit from Scotlands resources. Companies like the Israeli owned Delek Group are currently involved in North Sea drilling. Machair Windfarm and others like it, is history repeating itself. Scotlands resources being sold off for external profit.

We live in an era of blatant political and media lying and cherry picked truths set out of context. I suspect this whole public consultation is a formality, a tick box exercise. That money has already changed hands and assurances given behind closed doors. I suspect this is why politically, our political representatives have been silent. I suspect that the 144 wind turbines proposed will be reduced so that it can be reported that communities have been listened too. I suspect that the environmental and socio-economic Pandora's box is about to be opened, and that the Inner Hebrides will have to bear the costs.

Based on my own local knowledge, I also wish to highlight that: The view from my house window in Iona, is one that inspired the Scottish Colourists, a principal Scottish art movement. Samuel Peploe and John Cadell, returned to Iona again and again to immerse themselves in the natural views and wildlife found in Iona. .

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Finally, I would also ask the Scottish Ministers to consider: The view from my house window in Iona, is one that inspired the Scottish Colourists, a principal Scottish art movement. Samuel Peploe and John Cadell, returned to Iona again and again to immerse themselves in the natural views and wildlife found in Iona. .

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1.1.99 Further Comments

The view from my house window in Iona, is one that inspired the Scottish Colourists, a principal Scottish art movement. Samuel Peploe and John Cadell, returned to Iona again and again to immerse themselves in the natural views and wildlife found in Iona. .

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1.1.100 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements applicable to its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes as well as on the coastal communities and their heritage. Moreover, published analyses of the applicant’s documents reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted. The identified effects on the impacted island communities remain unassessed, and the ecological criteria required by law have not been demonstrated as achievable. Additionally, the Scottish Ministers are only being asked to consider a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse the consent sought for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers consider granting consent, it is further requested that additional environmental information and enhanced visual representations be provided. Furthermore, the applications ought to be determined only after the holding of a public inquiry, allowing for a thorough examination of the concerns raised in this objection.

Regardless of the outcome, it is also requested that the Ministers explicitly address and document their conclusions regarding the effects on cultural heritage and the island communities affected by the proposal within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 111
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been filed by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded, that I am registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals involve the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts, comprising between 91 and 144 turbines, each reaching up to 335 metres in height to the blade tip. The development is sited within a designated Windfarm Development Area encompassing around 448 square kilometres of marine environment located north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is situated in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is founded on planning and environmental considerations, examined in relation to the statutory and policy frameworks governing these applications. It must be emphasised that the responsibility lies with the applicant to provide comprehensive and convincing evidence demonstrating that all relevant legal and policy tests are met. Objectors are under no obligation to disprove the applications. In this instance, the applicant has failed to meet the evidential burden required to justify approval. Consequently, I contend that consent for the proposed offshore wind farm should be refused.

1.1.101 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, permanently altering the character of the night-time seascape for its stated 35-year operational life. This change is not merely temporary; in policy terms, consenting to this development signifies an acceptance that the seascape is appropriate for wind farm use, thereby embedding a lasting impact on its nocturnal character.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore, there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.102 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The application falls short in providing adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, the applicant has not supplied the necessary assessments or evidence demonstrating that these values will be safeguarded. This absence of detailed evaluation contrasts unfavourably with the expectations of comprehensive heritage protection embedded within the relevant policy framework.

In addition, the application does not align with the provisions of GEN 6 nor paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the need for rigorous protection of heritage assets within marine planning contexts. Given that the Scottish Ministers lack before them any conclusive assessment addressing these concerns, the proposal fails to meet key policy requirements. Consequently, the application cannot be considered acceptable in respect of heritage asset protection.

1.1.103 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are attracted specifically by the qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes form the foundation of the visitor experience and underpin the local economy, making them integral to the viability of these communities. Any alteration to these defining characteristics would therefore have a direct and significant impact on the economic base that sustains these islands.

Such an impact would extend beyond the immediate economic consequences to affect essential local services, population stability, and the overall sustainability of the communities. The interdependence of the economy and social fabric means that

changes diminishing the qualities which draw visitors threaten not only financial prosperity but also the continuing viability of these island settlements. It follows that the proposal, by jeopardising the very qualities that attract visitors, poses a fundamental risk to the long-term economic and social sustainability of the island communities.

The applicant's socio-economic assessment fails to provide an adequate basis for mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

1.1.104 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over a period of several decades. This prolonged disturbance has the potential to cause significant adverse effects on the Priority Marine Features and Annex I habitats located within the development area itself. Given the scale and duration of the project, the cumulative impacts on the local ecosystem warrant careful consideration.

The surrounding waters of the site are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for essential life processes such as feeding, breeding, and migration. Any disruption to their habitat, whether through noise, water pollution, or physical presence, could have detrimental consequences for their populations, which may already be vulnerable.

In light of the ecological importance and sensitivity of both the site and its adjacent waters, it is imperative that the potential environmental effects of the proposed development are thoroughly assessed and mitigated. Failure to do so risks significant harm to nationally and internationally protected marine features and species. Consequently, the proposal should be reconsidered in view of these environmental constraints.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot

population of the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively excluded. This submission underscores the applicant's recognition of potential adverse impacts arising from the proposal. Moreover, the inclusion of these documents is a significant feature of the application itself, indicating that, according to the applicant's own reasoning, the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. While the provision of derogation and compensation plans demonstrates a proactive approach to addressing environmental concerns, it also highlights inherent uncertainties about the proposal's impact on the protected guillemot population, warranting careful and thorough consideration.

The evidence submitted, including the applicant's own derogation documents, clearly indicates that the statutory tests designed to protect internationally important habitats and species have not been satisfied. This lack of demonstration undermines the fundamental legal requirements that must be met before consent can be granted.

Given the nature of the ecological features involved and the statutory protections afforded to them, it is imperative that any proposal affecting such sites conclusively addresses these tests. The applicant's failure to provide the necessary certainty compromises the integrity of the assessment process and raises significant concerns about potential harm to these protected assets.

In light of the above, it is concluded that the application does not comply with the requisite statutory obligations. Therefore, the case for granting consent is not made out, and the application should be refused.

1.1.105 Cumulative and In-Combination Effects

The cumulative impact assessment presented is unreliable because it fundamentally relies on baseline assessments that understate the effects on landscape, heritage, and socio-economic factors. As outlined in the Environmental Impact Assessment, these initial assessments fail to fully capture the extent of harm, resulting in a diminished baseline from which cumulative impacts are evaluated. Consequently, when the proposal's combined effects with existing, consented, and foreseeable developments are considered, the assessment systematically underestimates the true scale of cumulative harm. This flawed approach compromises the accuracy and robustness of the cumulative assessment, leading to an unjustifiably optimistic conclusion about the overall impact. Therefore, the cumulative effects as presented cannot be relied upon for informed decision-making.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the deferred works, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. This omission undermines compliance with relevant planning policies and environmental regulations. Consequently, it is essential that the decision-making process expressly addresses the treatment of the deferred works to ensure a comprehensive and lawful

assessment. Without this, the application remains incomplete and cannot be properly determined.

1.1.106 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, which raises important questions about the legitimacy of the decisions made. The applicant invites Scottish Ministers to place significant weight on this process; however, the quality of participation at both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources at its disposal. Furthermore, National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, stipulates that those affected must have a realistic opportunity to engage in decisions of such magnitude. The conditions imposed on affected communities here fall short of this standard, a factor which Ministers should carefully consider when weighing the representations submitted.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment’s conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant’s dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.107 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay’s Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of

consequences for their local setting, economic activities, or community life. Similarly, Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and significant effects are accepted for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

However, the evaluation of heritage impacts appears to underestimate the significance of Iona's monastic landscape, which includes internationally important sites such as the Abbey, the Nunnery, and the high crosses. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape in understanding this heritage. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, potentially overlooking key experiential impacts.

Community concerns further underline the scale of the effects, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a landmark 141 metres high visible from Iona at approximately 33 kilometres; the largest turbines would exceed this height by approximately 194 metres at a closer distance of roughly two-thirds of that range. Taken together, these points suggest that the visual, community, and heritage impacts on Iona may be both more extensive and more significant than the applicant's assessment indicates.

The applicant's assessment recognises significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is rated as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—being identified as the community most directly affected by changes to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local

Landscape Areas are acknowledged. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity across distances ranging from approximately 21 to 33 kilometres, though the applicant attributes this only a Medium magnitude of effect.

However, the applicant's reliance on viewing distance as a primary determinant of impact magnitude results in a notably limited appraisal of certain areas. For example, the Wilderness and Gribun Rocks coastal area is judged to experience a small scale of change due to its viewing distance exceeding 30 kilometres, reflecting a distance-based reasoning that fails to capture the true extent of impact. Crucially, the assessment does not provide place-based evaluations for Mull's west-facing tourism economy, wildlife boat operations, or the accommodation sectors of its western townships, all of which depend intrinsically on the Atlantic seascape that the proposed development would industrialise. This omission neglects the significant visual, economic, and community effects on these tourism-dependent communities and their surrounding designated landscapes, undermining the comprehensiveness of the applicant's impact assessment.

The applicant's assessment fails to fully recognise the significant effects on designated landscapes and island communities, thereby risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is entirely subject to the same impacts identified for that landscape. As a small, re-establishing community reliant on its unspoilt seascape and setting for regeneration, the absence of any specific assessment for Ulva is a notable omission. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies some 35 kilometres from the development area—beyond the 30-kilometre assessment limit advised by NatureScot. Despite acknowledging its panoramic maritime qualities, the applicant concludes effects there would be small and not significant, a judgement that understates potential impacts. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic character, is assessed at a distance of around 28 to 32 kilometres with an assumed Medium to Low magnitude of effect based on distance and retained landforms; this moderation contrasts with the importance of its designation. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment approach. Collectively, these considerations suggest the applicant's evaluation underestimates or omits significant effects, undermining the proper protection of these sensitive seaboard landscapes and vulnerable island communities.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This conclusion contrasts sharply with the nature of the receptor, as Tiree's landscape character is exceptionally distinctive and vulnerable. Unlike other areas where vertical structures may be more commonplace or mitigated by existing features, Tiree's topography is uniquely low-lying and defined by its openness to sea and sky.

Tiree's highest elevation, Ben Hynish, reaches only 141 metres, while the proposed turbines would rise to 335 metres, introducing unprecedented vertical elements into an otherwise horizontal seascape. This significant alteration to the island's defining

characteristics cannot be adequately captured by a Low magnitude rating. Such an understatement leads to an unreliable evaluation of the impacts on Tiree's sensitive landscape character, warranting a reassessment that properly reflects the scale of change proposed.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate the visual and economic impacts of the development on surrounding communities. However, this approach fails to account adequately for the significance of the seascape to those communities whose identity and livelihood are intimately connected to these views. For instance, Ardnamurchan Point, as the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. The application's reliance on distance as a mitigating factor overlooks the quality and importance of these seaward panoramas, which are precisely the receptors to which such moderation is inappropriately applied.

Moreover, several mainland and island communities with direct outlooks to the development area have been omitted from any meaningful assessment of potential effects. Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet the applicant has not examined how the proposal might disrupt this finely balanced community and its economy. Similarly, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on the open Atlantic seaboard views towards Islay, Jura, and beyond, along with the Treshnish Isles and other small islands, share a common reliance on these seascapes. Their omission from the assessment compromises the comprehensiveness of the environmental and socio-economic evaluation, undermining confidence in the conclusions drawn by the applicant.

The assessment reveals a systematic pattern whereby the applicant's methodology reduces the recognised significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach results in the moderation of the magnitude of change and a corresponding discounting of impacts at these distances. Such a consistent pattern undermines the credibility of the environmental impact assessment, as it fails to fully acknowledge the potential consequences experienced by affected communities.

Moreover, this methodological choice means that those communities residing beyond the 20-kilometre threshold have not been subject to any detailed, place-specific assessment. The absence of a focused evaluation for these areas risks overlooking important localised effects, thereby limiting the scope and depth of the environmental appraisal. Consequently, the assessment does not provide a comprehensive understanding of the broader environmental and social ramifications.

In conclusion, the applicant's distance-based approach leads to an underestimation of significant effects on highly sensitive receptors beyond 20 kilometres, which compromises the integrity of the entire environmental impact assessment. This systematic discounting should be reconsidered to ensure that all relevant receptors and communities receive appropriate and thorough evaluation.

1.1.108 Personal Observations

In addition to the planning matters above, I am personally concerned because: It's is absolutely abhorrent that a wind farm of this size would even be considered for this area of Scotland. Such an iconic set of islands should not become a site for electricity production. Yes there are so many very critical arguments against it. The most obvious being it's a bloody long way from urban populations that need the electricity. Totally the wrong site. My Mum holiday as a child in this area visited all the islands. And now we see visitors to Scotland making the journey to visit these sacred islands. It would be an utter disgrace and Scotland shame if this wind farm was allowed to be built.

Finally, I would also ask the Scottish Ministers to consider: Yes I would very much like John Seinney to stand up for Scotland and state clearly; Enough is enough.

1.1.109 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been understated. Crucially, the necessary heritage assessment has not been undertaken, and while the effects on the island communities affected by the project were identified, they have never been thoroughly evaluated. Furthermore, the ecological requirements have not been proven to be achievable. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers decide against refusal, it is requested that the applicant be required to provide further environmental information and enhanced visualisations. Additionally, the application should only be determined following a public inquiry, enabling a comprehensive examination of the concerns outlined in this objection. Regardless of the ultimate decision, it is also sought that the Ministers explicitly address and provide clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 112
Dear Sir/Madam,

I hereby formally register my objection to the MachairWind Offshore Wind Farm proposals, detailed under application numbers 00012385, seeking consent pursuant to section 36 of the Electricity Act 1989, and 00012386, an application for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this communication be treated as a formal objection, that my status as an objector be recorded, and that I receive notification of the final determination in respect of these applications.

The proposals envisage the construction and operation of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 wind turbines, each potentially reaching a maximum height of 335 metres to blade tip. The development is planned within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine space located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities which form part of the southern Hebrides.

In the assessment of these applications, the statutory and policy frameworks provide the essential context for decision-making. It is incumbent upon the applicant to demonstrate, through robust and comprehensive evidence, that all relevant statutory tests and policy requirements have been fully met. This evidential burden lies solely with the applicant; objectors are not obliged to prove the contrary. Upon review of the documentation and supporting material submitted, it is clear that the applicant has failed to satisfy this requirement. Consequently, and for the planning and environmental reasons elaborated below, it is my firm position that consent for both the section 36 consent and the marine licence should be withheld.

1.1.110 Legislative and Policy Framework

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The application has not demonstrated compliance with these policies. There are deficiencies and omissions in the evidence submitted, and conflicts with the applicable legal and policy framework remain unaddressed. In particular, the lack of sound evidence as required by GEN 19 and paragraph 4.81 undermines the statutory assessment. Furthermore, the application fails to adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. The absence of

sufficient engagement in accordance with GEN 18 further compounds these shortcomings. The failure to properly consider the historic environment, landscape, natural heritage, and co-existence policies indicates a fundamental non-compliance with the National Marine Plan.

Given these unresolved deficiencies and conflicts, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established, where compliance has not been demonstrated or where evidence identifies such shortcomings, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused.

The application must be refused because it fails to provide the necessary environmental impact assessment and habitats regulations assessment as required by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. This statutory requirement has not been met in the current submission.

Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The applicant has not demonstrated compliance with these requirements, leaving the potential impacts on protected habitats unassessed and unmitigated.

The absence of adequate assessments constitutes a clear deficiency and omission in the application. Such failures conflict directly with the applicable legal and policy framework governing environmental protection and habitat conservation. Where compliance with these statutory duties has not been demonstrated, the law is explicit that these matters must weigh against the granting of consent. Therefore, the application is fundamentally flawed and should be refused on the grounds of inadequate environmental and habitats regulations assessments.

The applicant’s submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence provided does not show that these interests have been properly identified, assessed, or integrated into the planning proposal. This omission represents a fundamental procedural deficiency, as the statutory duty to consider island communities is not a discretionary matter but a legal obligation that must be fulfilled before consent can be granted.

Furthermore, the absence of any substantive analysis or evidence addressing the specific impacts on island communities constitutes a clear conflict with the applicable legal and policy framework. As established in the Islands (Scotland) Act 2018 and reiterated in the supporting evidence, where compliance with this statutory requirement has not been demonstrated, or where deficiencies and omissions exist, these factors must weigh decisively against the granting of planning consent. Given the failure to properly consider and weigh the interests of island communities, the proposal is contrary to the statutory framework and should be refused.

1.1.111 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria of NPF4 Policy 11, resulting in significant adverse effects on nationally designated landscapes and seascapes. Contrary to the policy's requirements, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be protected, nor that island communities would be adequately safeguarded. Furthermore, the ecological assessments submitted do not establish that the necessary environmental tests can be met. As NPF4 Policy 11 supports renewable energy development only insofar as these impact criteria are complied with, the proposal cannot be regarded as consistent with the policy's provisions.

The proposal, as currently presented, would result in significant adverse impacts on a range of nationally designated assets, undermining the protections established by the National Planning Framework 4 (NPF4). Most notably, it would cause substantial harm to the qualities for which National Scenic Areas and other nationally important landscapes and seascapes have been designated. This outcome directly conflicts with Policy 11, which works in tandem with Policies 4(c) and 4(d) to safeguard these special places from detrimental effects. The practical consequence is a clear failure to uphold the statutory purpose of these designations, thereby weakening the integrity of landscape conservation at a national level.

In addition to landscape concerns, the proposal fails to demonstrate adequate protection for heritage assets, particularly scheduled monuments and their settings. Policies 7 and 7(h) require that development does not adversely affect the cultural significance of such assets, ensuring their preservation for future generations. However, the evidence submitted does not convincingly establish that these requirements would be met. Nor does it confirm that island communities, which often have unique historical and social characteristics, would be safeguarded in line with Policy 7(c) and 7(d). The lack of clarity and assurance in this regard raises substantial doubts about the proposal's compliance with heritage protection standards within NPF4.

Furthermore, the ecological criteria set out in Policy 3 have not been satisfactorily addressed. The proposal has not provided sufficient evidence to confirm that the ecological tests—designed to conserve and enhance biodiversity—can be met. This omission is critical, as the protection of biodiversity is a fundamental objective underpinning national planning policy. Taken together, these deficiencies demonstrate that the proposal is inconsistent with the comprehensive framework of NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity. Consequently, it should not be supported in its current form.

There remains uncertainty as to how the proposal aligns with the terrestrial development plan policies relevant to land-based effects, notably those set out in the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse impacts on the landscape, heritage, and community interests that these policies are designed to protect. This raises significant questions about the consistency of the development with the framework intended to safeguard such valued local characteristics.

In light of this, the proposal stands in conflict not only with the specific provisions of the Local Development Plan but also with the broader objectives of National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to dispel these concerns or to demonstrate that the proposal complies with the development plan framework. Consequently, the proposal should be regarded as inconsistent with the relevant terrestrial planning policies.

1.1.112 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

The applicant's evidence draws on NatureScot's visualisation guidance, which acknowledges inherent limitations in the visual materials used to support the assessment. Specifically, the guidance recognises that printed visualisations cannot fully replicate the scale as perceived by a viewer on site. Furthermore, wireline drawings, which are presented within the same panoramic projections as the photographs, share the same constraints. These wireline drawings serve as a technical rendering within the visualisation rather than an independent corrective to photographic limitations. Consequently, while these visual materials provide a useful illustrative tool, they are inherently constrained and should be interpreted with an understanding of their technical and perceptual limitations.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.113 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to comply with the required methodology for evaluating effects on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the applicant claims to have adopted Historic Environment Scotland's recognised methodology—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained—the assessment does not demonstrate that this evaluative step has been properly undertaken. Instead, the operational assessment focuses primarily on describing visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without explicitly showing how this conclusion follows from the methodology's requirements. As emphasised in the Methodological Audit prepared independently from the applicant's Appendix 14.3, the assessment conflates visual change with adverse impact, contrary to the methodology's clear statement that visual change should not be equated directly with adverse effect. Consequently, the absence of a transparent and methodical evaluation of setting integrity calls into question the assessment's validity and the soundness of its heritage impact conclusions.

The applicant's own baseline acknowledges that the cultural significance of the affected heritage assets arises from a range of qualities, including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. It further recognises the importance of the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, emphasising that these attributes are experienced dynamically through movement rather than from static viewpoints.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted a concern that the assessment may not fully capture these wider experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the broader cultural landscape and its associated values are more comprehensively represented.

This indicates a potential shortfall in the applicant's current evaluation of heritage impacts, suggesting that the assessment might benefit from a more nuanced approach that takes into account the cultural landscape as a whole, rather than focusing predominantly on fixed viewpoints. Such consideration is essential to adequately safeguard the heritage assets' significance in a manner consistent with their identified baseline qualities.

The application fails to demonstrate compliance with key policy requirements essential for the protection of heritage assets, notably engaging NPF4 Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to their settings, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided sufficient evidence to confirm that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage assets will be adequately protected. In light of this, the proposal does not meet the requisite policy standards for heritage protection and should therefore be deemed unacceptable.

1.1.114 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities, which depend to an exceptional degree on visitors. These visitors are attracted by precisely those qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—that the applicant's own baseline assessments identify. Any changes to these qualities would undermine the economic base of these communities, with consequential impacts on local services, population stability, and their long-term viability.

The applicant's socio-economic assessment notably contrasts the detailed evaluation of potential port communities with a generalized, regional-level approach to island communities, despite acknowledging habitability as a significant pathway for impact. While mitigation measures are proposed with respect to port areas, no comparable place-based assessment or tailored mitigation is undertaken for the island communities directly affected by the development. This discrepancy undermines confidence in the adequacy of the proposed mitigation for these island populations.

Island economies, by their nature, differ markedly from regional averages. Their economic structures are heavily concentrated in sectors reliant on the unique qualities that attract visitors, making them particularly sensitive to any changes in those attributes. Contrary to this reality, the applicant's conclusion that island communities exhibit low sensitivity to tourism-related effects is reached without the benefit of localized, place-specific analysis. Such a conclusion cannot be considered robust evidence but rather an unsubstantiated assumption.

Given these considerations, the methodology employed fails to capture the nuanced vulnerabilities of island communities, and the absence of place-based assessment leaves the true socio-economic impacts inadequately understood and potentially unaddressed. It is therefore essential that a more detailed and context-specific evaluation be undertaken to ensure that mitigation measures are appropriately targeted and effective for island populations.

There remains significant uncertainty as to whether the proposal complies with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan mandate that decisions be based on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process. However, the applicant has acknowledged the need for particular scrutiny of island communities yet failed to conduct the necessary assessment to understand the potential impacts on them. Consequently, there is no demonstrated compatibility with the principles of sustainable island communities, and the statutory duties owed to these communities have not been satisfactorily discharged. In light of these shortcomings, the proposal does not meet the required planning and statutory standards, and therefore cannot be supported.

1.1.115 Ecology, Biodiversity and Habitats Regulations

The evidence submitted by the applicant clearly identifies that the development area encompasses Priority Marine Features and Annex I habitats, demonstrating the site’s high ecological value. These designated features are critical components of the marine environment, indicating habitats that are rare, sensitive, or otherwise of significant conservation importance. Moreover, the surrounding waters provide essential habitat for a variety of protected species, including seabirds, marine mammals, and the basking shark, all of which are recognised for their vulnerability and conservation status. The presence of such species and habitats within and adjacent to the development footprint underscores the intrinsic ecological sensitivity of the area and elevates the potential risk profile associated with any substantial anthropogenic disturbance.

Given the scale and duration of the proposed development, which entails construction, operation, and decommissioning activities extending over several decades, there exists a considerable potential for significant adverse environmental effects. The introduction of large-scale industrial activity into this ecologically important marine environment could disrupt habitat integrity, disturb protected species, and degrade the overall biodiversity value of the site. The prolonged nature of the development phases further amplifies the risk of cumulative and long-term impacts. Consequently, careful consideration must be given to the potential environmental consequences, and robust mitigation measures will be essential to avoid or minimise harm to these Priority Marine Features and protected species. Without such safeguards, the proposal poses a substantial threat to the conservation objectives associated with this sensitive marine ecosystem.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan reflects an acknowledgement of the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically targeting the guillemot population. These documents, by their very nature, are prepared for circumstances where it is not possible to exclude adverse impacts on the integrity of the protected site. Their inclusion in the application is therefore a critical feature, signalling that the applicant recognises uncertainties regarding the potential environmental consequences and is proposing measures intended to address these under the relevant derogation provisions.

This approach implicitly accepts that, despite proposed mitigation, there remains a risk that Scottish Ministers may reach a different conclusion concerning adverse effects on the site's integrity. The submitted derogation and compensation plans serve as a procedural safeguard to enable consideration of potential impacts and compensatory measures. However, the presence of these documents also highlights that the applicant's assessments do not definitively exclude harm, placing significant weight on the effectiveness and adequacy of the proposed compensation in any subsequent planning decision. This underscores the importance of rigorous scrutiny of both the potential adverse effects and the compensatory strategies before any consent is granted.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed

examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.116 Cumulative and In-Combination Effects

There is significant uncertainty surrounding the current assessment approach for the proposed development, arising from the fact that only a portion of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—without which the wind farm cannot function—have been deferred to subsequent applications. This fragmentation means that the full range of impacts associated with the entire project are never evaluated concurrently, leaving a considerable gap in the understanding of its cumulative effects.

This piecemeal consideration is fundamentally at odds with established legal principles governing environmental assessment. The courts, as reaffirmed in the Raeshaw Farms case, have made clear that a project must be assessed in its entirety rather than being artificially segmented into smaller parts whose individual impacts appear less significant. By deferring key components of the development, the current process effectively circumvents comprehensive scrutiny, undermining the integrity of the decision-making framework.

In light of these concerns, it is essential that the assessment be reconsidered to ensure that all integral elements of the project are examined collectively. Only through such an approach can the Scottish Ministers properly evaluate the full environmental and planning implications, thereby upholding both legal requirements and sound planning practice.

The cumulative impact assessment relies heavily on the baseline conditions established in the earlier Environmental Impact Assessment chapters. It is important to recognise that if the foundational assessments concerning landscape, heritage, and socio-economic factors have understated the severity of effects, then the cumulative assessment inevitably inherits these limitations. This results in a diminished baseline from which combined impacts are measured, thereby skewing the overall appraisal of cumulative effects.

Given this dependency, the cumulative effects presented must be viewed with caution. When the baseline underrepresents the true extent of environmental and social harm, the aggregation of impacts from the proposal alongside other existing, consented, and foreseeable developments will similarly be understated. This creates a misleading impression that the combined effects are less significant than they genuinely are, potentially leading to inadequate mitigation strategies.

In conclusion, the reliability of the cumulative impact assessment is compromised by these flawed baseline assumptions. Without accurate and comprehensive baseline data, the assessment does not fully capture the scale of combined effects, which risks underestimating the true consequences of development. It is therefore essential

that these foundational assessments are revisited to ensure that cumulative impacts are properly understood and addressed.

There remains significant uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, particularly concerning project splitting and the assessment of cumulative effects. The proposal has not satisfactorily demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), nor the requirements set out in the EIA Regulations. This lack of clarity undermines confidence that the cumulative and in-combination effects, both of the current proposal and the project as a whole, have been reliably identified and thoroughly assessed.

Given these unresolved issues, it is imperative that the decision-making process explicitly addresses how deferred works are to be treated. Without such consideration, there is a material risk that significant environmental impacts may be overlooked or underestimated. Therefore, I respectfully request that the determination expressly incorporates an assessment of the deferred elements to ensure full compliance with policy and regulatory frameworks.

1.1.117 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant's extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

There remains significant uncertainty as to whether the Environmental Impact Assessment (EIA) submitted is sufficient to enable the Scottish Ministers to make a fully informed decision on this application. While the EIA is extensive in scope, it falls short in critical respects. Across multiple topics, the assessment identifies potential pathways to significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks clear demonstration of applying its integrity test; and the socio-economic assessment

omits any place-based analysis of the islands directly affected. Moreover, the applicant frequently defers key matters to future stages—relying on post-consent plans, monitoring, and additional approvals—which does not satisfy the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Ultimately, the Scottish Ministers are obliged to decide on the evidence currently before them, not on assumptions that outstanding issues will be resolved later. In this regard, the applicant has not demonstrated that the environmental information provided is adequate for the purpose of making a sound and lawful decision.

1.1.118 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This acknowledgement implicitly concedes that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

While the applicant's assessment acknowledges certain impacts on Iona, a detailed analysis reveals that these effects are both more significant and more extensive than portrayed, thereby undermining the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with a direct orientation towards the development site and extensive visibility. The geographical extent of change is described as large, encompassing a distance of approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. This scale of visual intrusion is substantial, especially when considered alongside the West Coast of Iona, which is similarly assessed as highly sensitive with widespread visibility. The applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì.

The heritage value of Iona's monastic landscape further compounds these concerns. The Abbey, the Nunnery, and the high crosses are recognised as heritage assets of international importance, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—specifically from the ferry crossing itself—no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that limits the understanding of the visual impact on key heritage experiences.

Community sentiment also underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed, leaving a critical aspect of social impact unexamined.

To contextualise the perceived scale of the turbines, a comparison with a familiar local landmark is instructive. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by about 194 metres while being situated at roughly two-thirds of the distance. This stark comparison highlights the overwhelming physical presence the turbines would have on the island's landscape.

In summary, the visual, community, and heritage impacts on Iona have been significantly underestimated in the applicant's assessment. The scale and significance of these effects warrant a more thorough and accurate evaluation to ensure that all potential consequences are fully understood and appropriately addressed.

The applicant's assessment fails to adequately address the significant visual and economic impacts on Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Although the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres, it is only attributed medium magnitude effects. The applicant concedes significant effects at Erraid and on the Core Paths of the Ross, as well as on Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors. This community is directly tied to visitor flows and would therefore experience substantial consequences. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. Notably, the Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is acknowledged as highly sensitive at distances between 21 and 33 kilometres, yet is assigned only medium magnitude impacts. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are downplayed due to viewing distances exceeding 30 kilometres, despite the evident scale of change. Crucially, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, its wildlife boat operations, or the accommodation sector in its western townships, all of which depend heavily on the Atlantic seascape that the development would industrialise. This omission overlooks the practical consequence that these communities and their economic activities would be detrimentally affected by the proposed development.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to understate the significance of effects, particularly when considering the scale of potential mitigation compared to the inherent qualities of these areas. For example, while the applicant acknowledges the panoramic maritime qualities of Staffa, located approximately 35 kilometres from the development area and within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant. This conclusion is reached despite Staffa lying beyond the approximate 30 kilometre distance to which NatureScot advised the assessment of effects on National Scenic Area qualities should extend, suggesting that the assessment may not fully account for the broader seascape impact.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

Of particular concern is the omission of any specific assessment of Ulva, a community-owned island within the Loch na Keal National Scenic Area that shares fully in the effects on that designated landscape. Ulva is a small, re-establishing community whose recovery depends on the unspoilt qualities of its setting and surrounding seascape. The absence of dedicated consideration for Ulva's unique social and environmental context undermines the protection of its natural and cultural qualities. Overall, the applicant's approach tends to underestimate significant effects on both designated landscapes and vulnerable island communities, thereby weakening the safeguard of their important attributes.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects. Specifically, the South Tiree coastal area is designated as having High sensitivity at approximately 35 kilometres distance, yet is attributed only a Low magnitude of change. This assessment fails to adequately reflect the unique characteristics of Tiree, which is an exceptionally low-lying island defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres, making the introduction of turbines up to 335 metres in height an unprecedented vertical intrusion into the seascape. Given that Tiree's character rests on an open oceanic horizon, such tall structures would fundamentally alter the landscape's visual integrity. Therefore, the conclusion of Low magnitude for such an exposed and sensitive receptor is a clear understatement. In consequence, the applicant's evaluation cannot be considered reliable in respect of the effects on Tiree's landscape character.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach overlooks significant impacts

on mainland and island communities that have direct visual and economic connections to the development area. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development from the east; yet, the effects on its delicate community balance and local economy have not been examined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the distance-based mitigation seeks to moderate, calling into question the adequacy of such an approach. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other small islands and mainland coasts viewing the development area, have not been fully accounted for. Taken together, these omissions indicate that the applicant's assessment lacks the necessary comprehensiveness regarding the effects on these sensitive and economically reliant communities.

The applicant's environmental impact assessment applies a distance-based approach that systematically moderates the magnitude of change and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. Taken together, these places demonstrate a single proposition: wherever the applicant's assessment encounters such receptors beyond this threshold, the significance of impacts is diminished, and the communities residing in these areas have not been afforded any place-based assessment. This methodology undermines the integrity of the overall assessment by failing to adequately recognise or evaluate the real and potentially significant effects experienced by distant but sensitive populations.

1.1.119 Personal Observations

In addition to the planning matters above, I am personally concerned because: Yes. We visit the area of west mid Argyll very regularly and know how integral the unspoiled beauty of land, sea and islands are to the economic and personal well being of all who live there. The wildlife that inhabits these precious places need preserving in their own right and for the tourism they bring.
The scale of this proposal, which almost beggars belief, would destroy all that makes the inner Hebrides such a unique and special place. Small scale community owned wind farms are one thing. This hyper scale development is completely out of keeping with the whole area and will not bring any benefit to its people.

Based on my own local knowledge, I also wish to highlight that: The visual beauty of the area is unique and unsurpassed. A vast ring of towers round it will ruin every view, every boat trip or sailing and no doubt deter visitors. Not to mention the toll on sea birds. The size of the turbines as well as their number will dwarf all vistas and intrude into every scenery in devastating ways. This will make island life, already really challenging, even more precarious in threatening income from tourism. It fundamentally will disempower those having to live with the domination of the turbines and the economic model of extractive corporate capitalism that they represent. A recent visit to Lunga, Staffa and Iona, to witness the seabird colonies there - puffins, guillemots, razor bills - was utterly captivating. As were the uninterrupted views from the islands. This will be irreparably damaged by the

development and will change the fundamental experience of visiting - and living on - these islands. It will also severely threaten the seabirds.

Finally, I would also ask the Scottish Ministers to consider: I would like them to consider the whole identity of Scotland, and how much the western isles embodies that identity for Scots and also for those who are drawn to visit Scotland. Selling off the seabed to a foreign company in such a manner is a travesty and a betrayal of Scotland as a whole. The burdens of such developments always fall on those on whom it is being imposed, while the profits go elsewhere. This is always the case and the Scottish government should know this. Agreeing to this proposal will destroy any trust people have in the government to stand up for Scotland over corporate lobbying power. The Inner Hebrides are jewels never to be sold, but valued and protected for all to enjoy and treasure.

1.1.120 Further Comments

For me, if the SNP government agree to this, it will be death knell to any claim that the SNP really care about the fundamental nature, landscapes and rural communities of Scotland. It will feel as if the government see every part of Scotland as a resource to sell to the highest bidder over local peoples' heads and to their utter detriment. It reeks of the colonial mindset, the very thing that the SNP claims to exist to counter. The betrayal will be immense and will not be recoverable.

1.1.121 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluations acknowledge significant impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal area. Furthermore, analyses published from the applicant's documentation reveal that these impacts have been understated, with the necessary heritage assessment absent from the submission. In addition, although the effects on the island communities involved have been identified, no assessment of these impacts has been undertaken. The ecological requirements stipulated by relevant legislation have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers incline against refusal, I request that the applicant be required to provide additional environmental information accompanied by enhanced visualisations. Moreover, the decision should be deferred until after a public inquiry, ensuring that the concerns raised within this objection receive thorough scrutiny. Regardless of the outcome, I further request that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons for the decision.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 113
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, brought forward by MachairWind Limited (ScottishPower Renewables), relate to the construction and operation of an offshore wind energy development with an installed capacity of approximately 2 gigawatts. The project envisages between 91 and 144 turbines, each reaching a blade tip height of up to 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This area lies north-west of Islay, west of Colonsay, and approximately 21 kilometres from Iona, placing it in close proximity to the southern Hebridean islands and their coastal communities.

In accordance with procedural expectations, I request that this correspondence be formally registered as an objection, that I be recognised as an objector, and that I receive notification of the determination of these applications. The grounds for objection are founded on both planning and environmental considerations, framed by the relevant statutory and policy contexts governing such developments. It is essential to emphasise that the responsibility lies entirely with the applicant to provide robust and sufficient evidence demonstrating compliance with all applicable regulatory tests. Objectors bear no obligation to substantiate contrary claims.

Upon thorough examination of the submissions and supporting evidence, it is evident that the applicant has failed to meet the requisite standards to justify approval. Consequently, for the reasons elaborated herein, I submit that consent should be withheld.

1.1.122 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed to address potential adverse effects on the protected interests. This lack of compliance with the statutory framework is a fundamental failing.

Given these unresolved uncertainties and the failure to meet the statutory obligations under Schedule 9 of the Electricity Act 1989, the application should be refused

consent. Where compliance has not been demonstrated, and where evidence identifies such deficiencies and conflicts with the applicable legal and policy framework, these matters weigh decisively against granting consent.

The marine licence application fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies—including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts)—constitutes a fundamental procedural and substantive deficiency.

The application's failure to provide sound evidence and to address cumulative impacts, as required by GEN 19 and GEN 21, undermines the statutory assessment process. Moreover, omissions and conflicts with policies protecting the historic environment, landscape, natural heritage, and requirements for effective engagement further demonstrate that the application does not meet the legal and policy standards mandated by the National Marine Plan. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent.

In light of these deficiencies, omissions, and conflicts with the applicable legal and policy framework, the marine licence application cannot be considered compliant with the Marine (Scotland) Act 2010 or the National Marine Plan. Consequently, the application should be refused on the grounds that it does not satisfy the statutory criteria for authorisation.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), as outlined in the applicant's evidence (S01). This recognition establishes the correct policy framework against which the proposal should be assessed.

However, the evidence clearly indicates that the proposal fails to demonstrate compliance with these key policies of NPF4. There are identified deficiencies and omissions in the applicant's submission concerning biodiversity protection, the safeguarding of natural places, the conservation of historic assets, and adherence to energy policies. These shortcomings represent conflicts with the applicable legal and policy framework, as the applicant has not provided sufficient evidence to satisfy the requirements of Policies 3, 4, 7, and 11. The absence of demonstrated compliance is a critical failing in the application.

Given these unresolved deficiencies and the failure to meet the statutory and policy obligations set out in NPF4, the proposal does not accord with the relevant planning framework. As established in the evidence (S01), where compliance has not been

demonstrated or where conflicts with the legal and policy framework exist, these matters weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not comply with the essential policies of National Planning Framework 4.

The application fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations require that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. The submitted documentation does not meet this statutory requirement, lacking a comprehensive and robust assessment of environmental impacts. This deficiency undermines the decision-making process by failing to present the necessary evidence to evaluate the proposal's environmental consequences fully.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any demonstration of compliance, constitutes a clear breach of legal obligations. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh decisively against the granting of consent. Given the failure to satisfy these fundamental statutory requirements, the proposal should be refused.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement obliges decision-makers to explicitly address the specific needs and circumstances of island communities during the planning process. The absence of such consideration undermines the integrity of the decision-making framework and contravenes the legal duties established by the Act.

The submitted evidence does not demonstrate compliance with the Islands (Scotland) Act 2018. There are clear deficiencies and omissions in the assessment of how the proposal impacts island communities, and no adequate explanation or justification has been provided to show that their interests have been given due weight. This failure to engage with the statutory requirements constitutes a conflict with the applicable legal and policy framework governing planning decisions affecting island areas.

Given these shortcomings, the proposal cannot be regarded as meeting the necessary legal standards. Where compliance with the Islands (Scotland) Act 2018 is not demonstrated, and where evidence identifies such deficiencies and omissions, these matters must weigh decisively against the granting of planning consent. Accordingly, the application should be refused on the basis that it fails to satisfy the statutory obligations to properly consider and protect the interests of island communities.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortfall in meeting the evidential burden necessary for the determination of this application. Without such comprehensive demonstration, the application cannot be considered to have satisfied the legal and policy frameworks that govern the proposal.

Moreover, the evidence submitted contains clear deficiencies and omissions that undermine the applicant's case. These gaps in the documentation and assessment process mean that critical statutory and policy obligations remain unaddressed. The absence of conclusive proof of compliance with all applicable requirements is a material consideration that weighs heavily against the granting of consent in this instance.

In conclusion, the applicant's inability to meet the essential responsibility of demonstrating full compliance with the legal and policy framework is a decisive factor. As established in the evidence, where such compliance is not demonstrated, or where conflicts and omissions exist, these matters must be given significant weight in the decision-making process. Therefore, the application should be refused on the grounds that the applicant has not fulfilled the necessary evidential burden.

1.1.123 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other receptors as set out in clauses (c), (d), and (e). The proposal under consideration fails to meet these criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's environmental safeguards. Furthermore, the submission does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be effectively safeguarded from negative impacts. In addition, the ecological assessments provided are insufficient to confirm that relevant environmental protections can be achieved. Collectively, these shortcomings establish that the proposal conflicts with the impact criteria integral to NPF4 Policy 11, thereby negating its intended support for renewable energy initiatives.

When assessing the proposal against the relevant policies within NPF4, it becomes apparent that the necessary mitigation measures to prevent significant adverse effects on designated assets have not been satisfactorily demonstrated. Policy 11 must be considered alongside Policy 4(c) and 4(d), which afford protection to National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on the qualities for which these areas are designated. In addition, Policies 7(h), 7(c), and 7(d) specifically safeguard scheduled monuments, their settings, and other historic assets. Policy 3 further requires the protection of biodiversity. The evidence submitted fails to show that the proposal's impacts can be effectively mitigated to a degree that would comply with these interconnected

policies, particularly in relation to the preservation of landscape qualities, heritage asset significance, and ecological integrity.

Moreover, the proposal falls short in demonstrating that it would safeguard island communities and their unique cultural and environmental contexts, which are fundamental considerations under these policies. The significant adverse effects anticipated on nationally designated landscapes and seascapes are not adequately addressed, nor has the cultural significance of scheduled monuments and their settings been convincingly protected. The ecological assessments submitted do not meet the requisite tests to confirm that biodiversity interests would be maintained or enhanced. Taken together, these shortcomings establish a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, thereby undermining the proposal's compliance with the national planning framework.

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, as it would have adverse effects on the landscape, heritage, and community interests that these policies seek to protect. This incompatibility arises because the development would undermine the very attributes that the local plan is designed to safeguard. Consequently, the proposal does not accord with the development plan framework, nor does it align with the National Planning Framework 4 when considered in its entirety. Furthermore, the applicant has failed to demonstrate any justification or mitigation that would resolve this conflict. Therefore, the proposal is inconsistent with the relevant land-based policies and should not be supported.

1.1.124 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Although the methodology outlined in Appendix 16.1 does not explicitly define any distance threshold beyond which major effects cease, independent analysis based on the applicant's own Chapter 16 and associated appendices reveals a consistent pattern: receptors more than 20 kilometres away are not assigned the highest magnitude of change, regardless of their sensitivity or the extent of visibility.

This implicit distance-based moderation is further confirmed by the applicant's own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where designated landscapes are located. This calls into question the reliability of the conclusions presented to the Scottish Ministers, as the methodology does not

accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations cannot fully capture the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections inherit the same limitations as the accompanying photography; they constitute technical renderings within the visualisation rather than independent corrections to it. This inherent constraint means that any visual evidence must be understood as a representation with acknowledged perceptual and technical boundaries, underscoring the need for cautious interpretation in the planning assessment.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the stated 35-year operational life. This change represents a significant departure from the existing dark and natural maritime environment, which has until now been free from such artificial illumination.

It is important to note that the 35-year operational period does not confine the extent of harm in policy terms. A decision to grant consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of the associated lighting effects. This sets a precedent for the future management and character of the area, with implications extending beyond the immediate timeframe.

Given these factors, the impact of lighting on the night-time seascape character warrants careful consideration within the planning balance. While recognising the operational requirements for safety and navigation, the permanent alteration of a previously unlit horizon raises concerns about the long-term preservation of the seascape's intrinsic qualities, which policy seeks to protect.

The applicant's assessment of the proposed development's effects on landscape and seascape interests fails to align consistently with its stated methodology, undermining the credibility of its conclusions regarding the scale of these impacts. While certain effects are acknowledged, the mitigation measures proposed do not sufficiently address the requirements set out in the relevant policies. This shortfall is particularly significant given the protections afforded to nationally important landscapes and seascapes, where robust and demonstrable mitigation is essential to meet policy objectives.

These deficiencies result in clear non-compliance with National Planning Framework 4 (NPF4) policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which safeguard key landscape and seascape interests. The absence of a thorough demonstration that the proposal meets these policy requirements calls into question its suitability and merits refusal on the grounds of insufficient mitigation and policy non-conformity.

1.1.125 Cultural Landscape, Archaeology and Historic Environment

Compared to the recognised Historic Environment Scotland methodology, which mandates a clear evaluation of how changes to setting affect the contribution setting makes to the cultural significance of historic assets and requires an explicit assessment of whether the integrity of setting is retained, the applicant's assessment falls short. While the methodology emphasises that visual change alone should not be equated with adverse impact, it nonetheless insists on an evaluative step that goes beyond merely describing visual alterations. This step is essential to ensure that conclusions about heritage impacts are founded on a robust understanding of setting's cultural significance and integrity.

However, a Methodological Audit prepared in support of community objections has demonstrated that the applicant's operational assessment does not fulfil this requirement. Although the assessment identifies relevant heritage attributes and discusses factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been evaluated in accordance with the adopted methodology. The absence of this crucial evaluative step undermines the reliability of the applicant's conclusions that the integrity of setting is adequately retained, thereby calling into question the overall validity of the heritage impact assessment.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions derived from it cannot be regarded as reliable. Where the landscape effects have been understated, as previously detailed, any conclusions about heritage impacts that rely on this assessment inevitably reflect the same understatement. This dependency undermines the credibility of the heritage evaluation and raises serious concerns about the robustness of the overall appraisal.

It is essential to recognise that the heritage conclusions are not independent but are intrinsically linked to the landscape assessment. As the evidence from source S01 makes clear, the heritage conclusions "depend upon the landscape assessment,"

meaning that any errors or omissions in the latter directly influence the former. Therefore, if the landscape assessment fails to accurately capture the extent or significance of landscape effects, the heritage conclusions built upon it must be regarded as compromised.

In light of this interdependency, the planning process must take account of the potential underestimation of landscape effects and the consequent impact on heritage conclusions. Without a thorough and accurate landscape assessment, the heritage impact appraisal lacks a sound evidential basis, which could lead to inappropriate decision-making. It is thus imperative that the landscape assessment is revisited and rectified to ensure that heritage impacts are properly understood and addressed in the planning determination.

There remains significant uncertainty regarding the extent to which the proposed development complies with established policies intended to safeguard heritage assets. This uncertainty is particularly acute in relation to NPF4 Policy 7(h), which addresses scheduled monuments, alongside Policies 7(c) and 7(d), which concern the preservation of their settings. These provisions are further supported by GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. The application's failure to explicitly address these elements raises concerns that essential policy requirements have not been fully engaged or satisfied.

Critically, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of heritage assets—both those of international and national importance—and their settings will be adequately protected. The absence of a thorough assessment precludes the Scottish Ministers from being in possession of the necessary information to conclude that heritage interests are properly considered and preserved. In light of this, the application falls short of meeting key policy obligations for heritage protection, thereby undermining its overall acceptability. It is therefore appropriate that the application be refused on these grounds.

1.1.126 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the proposal's impact on the island communities, which rely disproportionately on visitors drawn by specific qualities identified in the applicant's own baseline assessments. These qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—constitute the very foundation of the local economy. Any alteration to these attributes would not only undermine the economic base but also jeopardise essential services, resident populations, and the long-term viability of these communities. Consequently, the proposal poses a fundamental threat to the sustainability of the island settlements.

The applicant's own consultants have recognised habitability as a potentially significant pathway through which the proposal could impact island communities. Despite this acknowledgement, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities while neglecting a comparable place-based assessment of the island communities directly facing the proposed development. This approach culminates in a conclusion that these island

communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of specific, localized analysis.

Such a regional generalisation fails to capture the distinctive characteristics of small island economies, which are not accurately represented by regional averages. These economies tend to be highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers intensifies dependence on the very attributes that may be compromised by the proposal. Therefore, the conclusion of low sensitivity derived without place-based analysis cannot be considered robust evidence but instead amounts to an unsubstantiated assumption. This fundamental flaw in the socio-economic assessment methodology undermines the ability to fully understand or appropriately mitigate impacts on the island communities concerned.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal's effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal's compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system's requirements to safeguard island communities effectively.

1.1.127 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area.

Such documents are customarily prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The inclusion of these documents is a notable aspect of the application, as it acknowledges the potential for harm to the designated habitat. Furthermore, the applicant's own approach indicates that the Scottish Ministers may reach a different conclusion regarding adverse effects, underscoring the importance of these submissions in the overall assessment process. The preparation and presentation of these derogation and compensation documents demonstrate a recognition by the applicant of the environmental sensitivities involved and an intention to address potential impacts in accordance with statutory provisions.

The applicant's evidence confirms that, under the Habitats Regulations, planning consent may only be granted once the competent authority has ascertained that the proposed development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are fully satisfied. Importantly, consent can lawfully be given only where no reasonable scientific doubt remains regarding adverse effects. The responsibility to demonstrate this high evidential standard lies unequivocally with the applicant. It is further clarified that mitigation measures, compensation proposals, and future monitoring alone do not suffice to meet the statutory tests required by law. This legal framework is reinforced by policy provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Taken together, this establishes a stringent and legally binding threshold that must be met before any consent can be granted for developments impacting protected habitats and species.

The applicant's submission fails to demonstrate compliance with the statutory tests intended to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the legal requirements can be met, which is critical when considering the potential impacts on such ecological features.

Given this insufficiency, the case for granting consent is fundamentally undermined. Without clear assurance that the statutory protections will be satisfied, the proposal cannot be deemed legally compliant or environmentally responsible. Consequently, the application should not be approved in its current form.

1.1.128 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided

into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

The cumulative impact assessment relies heavily on baseline evaluations that have already been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. Given that the foundational Environmental Impact Assessment adopts this reduced baseline, any subsequent cumulative analysis necessarily inherits these limitations. As a result, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are inherently undervalued.

This methodological flaw undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential harm. Without an accurate and robust baseline, the true scale of cumulative impacts remains obscured, leading to an incomplete understanding of the proposal's broader consequences. Consequently, the assessment cannot be considered a sound basis for informed planning decisions.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), alongside the requirements set out by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it is evident that the cumulative and in-combination effects of the proposed development, including those arising from the project as a whole, have not been comprehensively demonstrated or reliably assessed within the documentation provided. This omission raises concerns about the adequacy of the environmental appraisal underpinning the proposal.

In light of these shortcomings, it is imperative that the deferred works associated with the project are explicitly considered and addressed during the determination process. Failure to do so risks overlooking significant environmental impacts and undermines compliance with pertinent planning policies and regulatory requirements. Accordingly, a thorough and transparent evaluation of all aspects of the project, including deferred elements, should be mandated to ensure a robust and policy-compliant decision-making outcome.

1.1.129 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself

comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.130 Effects on Local Area

There is significant uncertainty surrounding the applicant’s assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The development area lies immediately north-west of Islay and west of Colonsay, yet the application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay’s own coastline—is central to the applicant’s derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in

the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

The applicant's assessment acknowledges significant effects on several key areas within Mull and the Ross of Mull coastal communities and landscapes. Specifically, the Ross of Mull South coastal area is identified as having high sensitivity at distances of approximately 22 to 24 kilometres, with the applicant attributing a medium magnitude of effect. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, while Fionnphort—recognised as the gateway to Iona and the embarkation point for the crossing—is acknowledged to experience significant effects. This community is notably the most directly connected to the flow of visitors, underscoring its vulnerability to change.

Across the wider island of Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and

islands, is assessed as having high sensitivity throughout at distances ranging from approximately 21 to 33 kilometres. Despite this, the magnitude of impact is again limited to medium. This suggests a disparity between the sensitivity of the landscape and the scale of attributed effects, potentially understating the true extent of the development's influence.

Further illustrating this concern is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's assessment relies heavily on distance to justify a small scale of change, given that viewing distances exceed 30 kilometres. This approach exemplifies a distance-based reasoning that may fail to capture the qualitative and experiential aspects of visual and landscape impacts, particularly in areas of acknowledged high sensitivity.

Moreover, Mull's west-facing tourism economy, including its wildlife boat operations and accommodation sectors within its western townships, is intrinsically linked to the unindustrialised Atlantic seascape. The proposed development would industrialise this seascape, yet the applicant's assessment does not provide any place-based evaluation of the effects on these communities that depend on this setting. This omission raises concerns regarding the adequacy of the assessment in reflecting the economic and social ramifications for tourism-dependent communities.

In conclusion, while the applicant recognises significant effects in various designated landscapes and communities on Mull and the Ross of Mull, the assessment's reliance on distance to moderate perceived impacts, the limited magnitude attributed despite high sensitivity, and the lack of place-based analysis for key tourism-dependent communities collectively suggest that the visual, economic, and community impacts are not fully or appropriately addressed. This gap indicates a need for more comprehensive and locally nuanced evaluation to ensure these significant effects are properly understood and mitigated.

The applicant's assessment materially underestimates the impacts on important designated landscapes and vulnerable island communities, thereby jeopardising the protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, has not been assessed despite sharing fully in the effects on that designated landscape. This small, re-establishing community depends critically on the unspoilt seascape and setting, which are at risk from the proposed development. Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed with a conclusion of small-scale change and non-significant effect. This assessment conflicts with the applicant's own recognition of the island's panoramic maritime qualities and overlooks the fact that Staffa lies beyond the 30-kilometre distance NatureScot recommended for assessing effects on National Scenic Area qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is considered of High sensitivity at 28 to 32 kilometres distance but is attributed only a Medium to Low magnitude of impact, justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga and the Garvellachs National Scenic Area at 35 to 40 kilometres, which receives the same limited assessment. Collectively, these evaluations fail to reflect the full significance of the visual and environmental effects on these

designated landscapes and island communities, weakening the safeguards intended to preserve their distinctive character and vitality.

The applicant's assessment significantly underestimates the impact on Tiree's distinctive landscape, resulting in an unreliable evaluation of effects. The South Tiree coastal area is identified as having High sensitivity at a distance of approximately 35 kilometres, yet the magnitude of change is attributed as Low. This assessment fails to recognise the fundamental characteristics of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall would create vertical structures unprecedented in the island's seascape. Given that Tiree's character is based on an open oceanic horizon, this scale of development would cause a far greater magnitude of change than acknowledged. Therefore, the conclusion of Low magnitude is a clear understatement for such an exposed and sensitive receptor, undermining the credibility of the applicant's assessment.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape impacted by the proposed development. This omission undermines the comprehensiveness and reliability of the environmental appraisal. For instance, Gigha, a community-owned island emblematic of island regeneration following its purchase by residents, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its clear exposure to the development's influence. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation criticised in this objection, yet they remain unassessed. Furthermore, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are intrinsically linked to the open Atlantic seaboard views toward Islay, Jura, and adjacent waters. The Treshnish Isles and other smaller islands and mainland coasts with sightlines towards the development area share this position. By neglecting to evaluate the effects on these communities, the assessment fails to consider important social and economic receptors, thereby compromising its integrity and the planning process. It is therefore essential that the applicant revisits the assessment to fully incorporate the potential impacts on these mainland and island communities.

There remains considerable uncertainty regarding the applicant's methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant's approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.131 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have, in large groups from my Church community, made multiple multi-day long pilgrimages to the monastic communities on Iona and Mull where we stayed amongst the local community paying for camping or housed accommodation and spending money both on the islands and on the journey there (e.g. ferries and in Oban). The viability of tourism and the local economy has a direct effect on the monastics ability to live & operate on the island. Such pilgrimages are common and a significant contribution to those communities' economic vibrancy.

Based on my own local knowledge, I also wish to highlight that: St. Columba's bay is a holy site in Orthodox Christianity & an important place in the history of the Christianisation of Scotland and thus it's development of it's national character and state & cultural institutions, which will be significantly altered by the proposed development. It is also a place of outstanding natural beauty which will be ruined by the placement of the turbines, which also proven to devastate local bird and marine life and ecosystems wherever they are installed.

Finally, I would also ask the Scottish Ministers to consider: Scotland is already a net producer of electricity, but it's dilapidated grid system cannot handle the capacity it generates so the 'contract for difference' scheme results in these power companies being paid millions of pounds to switch their turbines off in order to prevent damage to the grid via overloading it. Since most / all of the generated electricity seems to be planned for export, it seems that this multinational corporation has simply chosen a sparsely populated are based on "ease of development" in order to effectively 'mine' the electricity generation protentional & sell it off. This will have no benefit to the affected local communities & wider nation of Scotland, while also inflicting profound irreversible negative effects on the local people and ecology. Sea-based turbines are also notoriously fragile, difficult to maintain and subject to frequent failure, with many causing local environmental disasters from e.g. broken blades filling the surrounding water & beaches with fiberglass & other toxic pollutants, and having a short lifespan requiring costly refurbishment, replacement or removal.

1.1.132 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own assessment acknowledges significant impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, a detailed review of the applicant’s submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted. Moreover, although the effects on the island communities involved were identified, these impacts have never undergone proper evaluation. The ecological assessments, which are essential to meet statutory tests, have not been demonstrated to be capable of compliance. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow the substantive issues raised in this objection to be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address and state their conclusions on the effects of the proposal on cultural heritage and the island communities within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 114
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching heights up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment to the north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from the island of Iona and is proximate to the islands and coastal communities of the southern Hebrides.

This objection is lodged with the request to be formally registered as an objector and for notification of the final determination on these applications. The following sections articulate the grounds for objection, focusing on the planning and environmental considerations framed by the relevant statutory and policy context governing the decision-making process. It is imperative to note that the onus lies squarely with the applicant to substantiate, through compelling and adequate evidence, that all applicable tests and criteria are met. Objectors bear no responsibility to establish contrary proof. In this instance, the evidence presented by the applicant fails to satisfy the requisite standards, and accordingly, consent ought to be withheld.

1.1.133 Conflict with National Planning Framework 4 and the Development Plan

In considering the proposal against the relevant policies within the National Planning Framework 4, it is apparent that the mitigation measures put forward do not adequately address the protections afforded to designated assets. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, establish a comprehensive framework for protection. The evidence shows that the proposed development would cause significant adverse effects to these nationally designated landscapes and seascapes, and the mitigation proposed falls short of preventing such harm.

Moreover, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor has it shown that the interests of island communities would be adequately safeguarded. Crucially, the ecological assessments fail to meet the necessary tests outlined in Policy 3, with no convincing evidence that biodiversity impacts can be effectively mitigated. Taken together, these shortcomings confirm that the proposal conflicts with the suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

1.1.134 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the duration of its stated 35-year operational life. This change would be significant in that it disrupts the existing dark horizon, fundamentally transforming the visual environment experienced along the coast after dark.

Furthermore, this operational lifespan does not mitigate the policy implications of such harm. The decision to grant consent for this development effectively constitutes an acceptance that this seascape is appropriate for wind farm use, setting a precedent with enduring consequences for the character and perception of the area. This assessment underscores the need for careful consideration of the seascape's intrinsic qualities and the broader implications of introducing lighting in what is now an unilluminated maritime setting.

The proposal's failure to comply with key planning policies has tangible consequences for the protection of nationally important landscapes and seascapes. This non-compliance undermines the effectiveness of the planning framework designed to safeguard these valuable environments, potentially leading to significant and unacceptable adverse effects. The practical outcome is that the proposal cannot be supported as it risks causing harm contrary to established policy objectives.

Specifically, the effects of the development engage several relevant policies, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively set out clear requirements to ensure that landscape and seascape interests are preserved and enhanced where possible. The applicant has not shown that the conclusions drawn about the scale of these effects align with the methodology it employs, creating uncertainty and a lack of confidence in the assessment provided.

Moreover, the absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes and seascapes, the planning authority cannot reasonably be expected to grant consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.135 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the applicant's adherence to the established methodology for assessing effects on the setting of historic assets, which calls into question the reliability of their conclusions about heritage impacts. While the applicant states that they have adopted Historic Environment Scotland's recognised methodology—developed through consultation and requiring an evaluation of how changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—this process is not clearly demonstrated. The methodology explicitly cautions against equating visual change directly with adverse impact. However, a published Methodological Audit, based solely on the applicant's Appendix 14.3, identifies that although the assessment acknowledges relevant heritage attributes and describes visual factors

such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to show how the integrity of setting has been evaluated in line with the accepted methodology. Crucially, the necessary evaluative step that distinguishes mere description from a robust assessment of integrity is absent across all examined examples. This omission undermines confidence in the assessment's conclusions that the integrity of setting is adequately retained.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

There remains considerable uncertainty as to whether the proposed development complies with the relevant planning policies designed to safeguard heritage assets. Specifically, the application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their settings, in conjunction with Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for the protection of cultural heritage of international and national importance.

Despite this policy framework, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately protected. Moreover, the Scottish Ministers do not have before them the comprehensive assessment that such a conclusion would require. In the absence of this critical evidence, the application cannot be regarded as compliant with the necessary heritage protection policies, thereby undermining its acceptability.

1.1.136 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence is fundamentally motivated by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the primary attractions drawing visitors to the area, forming the cornerstone of the local economy.

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed examination of potential port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Notwithstanding this absence, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects. This approach fails to address the particular circumstances of the islands and thereby undermines the reliability of the conclusions drawn.

Small island economies cannot be accurately represented as regional averages, given that their economic structures are often concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers intensifies reliance on these qualities, which are precisely those at risk from the proposed development. Therefore, the assertion of low sensitivity to tourism impacts, reached without any place-specific analysis, is unfounded and amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw in the applicant's socio-economic assessment methodology calls into question its adequacy in understanding or mitigating the effects on island communities.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it neglects the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, it does not adhere to NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and appropriately weighted through meaningful engagement from the outset to the conclusion of the planning process.

Crucially, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the potential effects of the proposal on these communities. This omission represents a

significant shortcoming in demonstrating that the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities have been fulfilled.

In conclusion, given the lack of adequate assessment and meaningful engagement with island communities as required by relevant policies and statutory frameworks, the proposal does not meet established planning and legal standards. Therefore, it cannot be considered compliant with the requirements designed to protect and support sustainable island communities.

1.1.137 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over several decades. This large-scale intervention risks causing significant adverse effects due to the disturbance and potential damage to Priority Marine Features and Annex I habitats situated within the development area itself.

Moreover, the surrounding waters serve as important habitats for various protected species, including seabirds, marine mammals, and basking sharks. The presence of these species underscores the ecological value and vulnerability of the site, necessitating careful consideration of any impact arising from the project.

Given the established ecological importance and sensitivity of the location, it is imperative that any proposals fully account for the potential environmental consequences. Adequate safeguards and mitigation measures must be incorporated to prevent unacceptable harm to these priority habitats and protected species throughout the lifespan of the development.

1.1.138 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation in that process is directly material to the decision. However, there have been clear deficiencies in participation not only at the plan and site-selection stages but persisting into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities. During this time, residents are continuously engaged throughout the visitor season, and access to specialist advice is limited. This contrasts sharply with the applicant’s position, having had years to prepare its case with substantial professional and financial resources.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by such decisions have a realistic opportunity to engage meaningfully. The conditions under which the affected communities have been expected to respond fall short of this standard. This undermines the legitimacy of the consultation process and, by extension, the site-selection process itself. It is therefore imperative that

Ministers bear these shortcomings firmly in mind when assessing the representations submitted in response to the application.

1.1.139 Effects on Local Area

The applicant's mitigation measures fall short in adequately addressing the direct and significant effects on the communities of Islay, Colonsay, and Oronsay. While the development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, the assessment treats Islay primarily as a potential project location rather than as a distinct island community with its own social and economic characteristics. This approach neglects a place-based evaluation of the impacts on Islay's Atlantic-facing communities, which are situated closest to the development boundary and whose daily lives and local economy are inextricably linked to their coastal setting. Consequently, the application's failure to assess how the development might alter the community's sense of place or economic wellbeing undermines the reliability of its environmental evaluation.

Similarly, for Colonsay and Oronsay, the environmental and heritage assessments inadequately consider the significance of the seaward outlook that defines daily life. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is at the centre of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is affected by gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these deficiencies demonstrate that the application underestimates the scale and nature of impacts on the local communities, economy, and heritage, calling into question the robustness of the overall environmental and heritage impact evaluation.

The applicant's own Coastal Character assessment recognises that the Sound of Iona is of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The overall effect is classified as Moderate and Significant, impacting an area approximately 21 kilometres away, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. This demonstrates that the scale of visual impact is substantial and geographically extensive.

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite

acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment recognises significant effects on various parts of Mull and the Ross of Mull coastal communities, notably acknowledging high sensitivity in the Ross of Mull South coastal area at distances of approximately 22 to 24 kilometres with a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross. Importantly, Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—is identified as experiencing significant effects, reflecting its direct connection to visitor flows. Similarly, significant impacts are noted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as on the Loch na Keal National Scenic Area, which is of high sensitivity throughout a range of 21 to 33 kilometres, though the magnitude attributed does not exceed medium.

However, the applicant's methodology relies heavily on distance as a determinant of impact, as illustrated by the assessment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, exemplifying the distance-based reasoning that this objection challenges. This approach risks underestimating the true significance of visual and experiential effects on sensitive landscapes and communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

Moreover, the assessment does not adequately address the economic and community implications for Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers reliant on the integrity of the Atlantic seascape. This seascape faces potential industrialisation from the proposed development, yet none of these coastal communities has been subject to a detailed, place-based evaluation. Without such focused consideration, the full extent of adverse effects on tourism-dependent economies and community cohesion remains insufficiently understood.

The applicant's assessment acknowledges potential effects on several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, where Ulva and Staffa are located. Ulva, a community-owned island at the initial stages of regeneration, lies within this National Scenic Area and shares fully in the effects identified for that designation. The island's recovery is closely tied to the preservation of its unspoilt seascape and setting, yet the applicant's assessment does not include any specific evaluation of impacts on this vulnerable community. Similarly, Staffa, situated about 35 kilometres from the development site and beyond the approximate 30-kilometre distance for which NatureScot requested an assessment, is noted by the applicant to experience only small-scale change with no significant effect. This conclusion is reached despite the acceptance within the

applicant’s own analysis of Staffa’s panoramic maritime qualities, which are among the most celebrated in Europe.

The Jura National Scenic Area, lying roughly 28 to 32 kilometres from the development, is assessed by the applicant as having high sensitivity but is attributed only a medium to low magnitude of impact. This moderation in effect is justified by the applicant on the basis of distance, the apparent scale of the development, and the retention of existing landforms. However, this approach does not fully consider that the Jura designation fundamentally reflects its wild, undeveloped character and Atlantic outlook, qualities that could be compromised even by moderate changes in the seascape. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated with the same assessment rationale, potentially underestimating the significance of impacts on these sensitive landscapes.

Overall, the applicant’s evaluation appears to underestimate or omit significant effects on important designated landscapes and the vulnerable island communities that depend on them. The absence of a dedicated assessment for Ulva, the reliance on distance thresholds that exclude notable features such as Staffa, and the moderate attribution of impact magnitude to areas designated for their wild and undeveloped character all raise concerns about the adequacy of the protection afforded to these natural and cultural qualities. Such omissions and underestimations could undermine the long-term preservation and regeneration prospects of these communities and landscapes, warranting a more comprehensive and nuanced consideration in the planning process.

The applicant’s assessment notably understates the magnitude of change experienced on Tiree when compared to the level of sensitivity attributed to the island’s landscape. While the South Tiree coastal area is correctly identified as having High sensitivity at approximately 35 kilometres, it is paradoxically assigned a Low magnitude of change. This assessment fails to account adequately for Tiree’s exceptional landscape character, which is defined by its exceptionally low-lying topography and the dominance of sea and sky. With the highest point, Ben Hynish, standing at only 141 metres, the introduction of turbines reaching up to 335 metres would create unprecedented vertical structures within the seascape. Given that Tiree’s character depends on an open oceanic horizon, the presence of such large turbines would cause a significant and conspicuous change. Therefore, the conclusion of a Low magnitude of change for such a highly exposed and sensitive receptor is an understatement and renders the overall evaluation of effects unreliable.

The applicant’s assessment fails to consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the applicant's distance-based visual impact mitigation approach fails to address adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant's overall assessment.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of the true impacts experienced by these receptors, as the assessment consistently moderates effects based solely on distance rather than on site-specific sensitivity or context.

This method fails to provide any place-based assessment for the communities living beyond this 20-kilometre threshold, despite the fact that these communities are demonstrably affected. By applying a blanket discounting of effects at this distance, the assessment overlooks meaningful environmental and social consequences, thereby undermining the integrity and comprehensiveness of the environmental evaluation process.

In conclusion, the reliance on a distance-based moderation and discounting framework leads to a significant gap in the assessment's scope and accuracy. To ensure a robust and credible environmental impact assessment, it is essential that effects on sensitive receptors beyond 20 kilometres are fully recognised and appropriately evaluated, rather than systematically diminished or ignored.

1.1.140 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Devastating to local island communities

1.1.141 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the applicable statutory and policy requirements. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on coastal communities and their heritage. However, subsequent published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, although detrimental effects on the island communities implicated by the development were identified, no formal

assessment of these effects has been conducted. The ecological criteria prescribed by the relevant tests have also not been evidently met. It is also pertinent to note that the application submitted to the Scottish Ministers pertains to only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse both consent for the MachairWind Offshore Wind Farm and the accompanying marine licence. Should the Ministers consider otherwise, it is requested that they mandate the provision of additional environmental information and enhanced visual representations. Moreover, the determination of the applications should be deferred until after a public inquiry, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and record their conclusions regarding the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 115
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. This letter should be recorded as an objection, with my status as an objector noted, and I request to be informed of the outcome of these applications.

The development under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area extending over approximately 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal communities of the southern Hebrides.

The subsequent sections articulate the grounds for objection, grounded in both planning and environmental considerations. These are framed by the statutory and policy context that governs the determination of these applications. It is important to emphasise that the onus of proof lies entirely with the applicant, who must provide adequate evidence to satisfy the relevant statutory and policy tests. Objectors bear no obligation to disprove the proposals. Having carefully assessed the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, consent should be withheld.

1.1.142 Legislative and Policy Framework

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland's National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs. The application lacks sufficient evidence to confirm that the proposal adequately addresses co-existence with other marine users, protects the historic environment, conserves landscape and national scenic areas, safeguards natural heritage, ensures meaningful engagement, provides sound evidence, and accounts for cumulative impacts. This absence of demonstrated compliance constitutes a fundamental deficiency in the statutory assessment process.

Given these evidential shortcomings and omissions, the application conflicts with the applicable legal and policy framework governing marine licencing decisions. As established, where compliance has not been demonstrated or where deficiencies exist, such matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the mandatory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside

relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this development.

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters weigh decisively against the granting of consent. In this case, the proposal's failure to address these critical policy requirements undermines the statutory and policy framework intended to protect biodiversity, natural environments, historic assets, and energy considerations.

Accordingly, the application should be refused on the basis that it does not meet the mandatory standards set out in NPF4, and the identified policy breaches constitute a clear and material planning objection.

The application must be refused because it fails to provide the legally required environmental impact assessment and habitats regulations assessment. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the proposal must be identified, assessed, and reported before any determination is made. This statutory requirement has not been met. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these obligations. Where such compliance is absent, or where deficiencies, omissions, or conflicts with the legal and policy framework are evident, these factors weigh decisively against granting consent. In this case, the failure to satisfy these fundamental legal requirements renders the application unacceptable and justifies refusal.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and afforded due weight in the decision-making process. The evidence from source S01 explicitly states this statutory obligation, establishing a clear legal framework within which proposals affecting island communities must be assessed. The absence of any substantive analysis or evidence within the application to show that these interests have been properly identified, evaluated, or balanced indicates a fundamental procedural deficiency. This omission undermines the integrity of the decision-making process and fails to meet the statutory standard set by the Islands (Scotland) Act 2018.

Furthermore, the failure to demonstrate compliance with this statutory duty, as highlighted in source S01, constitutes a significant deficiency and omission in the applicant's evidence base. Where such compliance is not evidenced, or where the application conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The proposal's disregard for the statutory requirement to consider and give due weight to island communities' interests represents a material conflict with the Islands (Scotland) Act 2018 and relevant planning policy. Accordingly, this failure alone provides a

compelling reason for refusal, as the proposal does not satisfy the legal tests necessary for lawful and proper consent.

1.1.143 Conflict with National Planning Framework 4 and the Development Plan

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

1.1.144 Seascape, Landscape and Visual Effects

The visualisation materials submitted in support of the application do not fully convey the true scale and impact of the proposed development as it would be experienced on site. NatureScot’s visualisation guidance, which the applicant has followed, explicitly recognises that printed visualisations are unable to replicate the actual scale perceived by a viewer in the field. This limitation means that the images provided are inherently constrained in their capacity to represent the development’s visual presence with complete accuracy.

Furthermore, the wireline drawings included within the panoramic visualisations share the same limitations as the photographic components they accompany. Rather than serving as an independent means to correct or enhance the photographic images, these wirelines are a technical rendering embedded within the visualisation package. As such, they cannot be relied upon to provide a fully objective or comprehensive representation of the potential visual effects, but rather should be understood as part of the overall visualisation that is subject to the same perceptual and technical constraints.

Given these acknowledged limitations, it is important that decision-makers approach the visual evidence with caution and do not place undue reliance on the submitted materials alone to assess the visual impact of the proposal. Supplementary on-site

assessments and a thorough understanding of the guidance's caveats are essential to form a balanced and informed judgement on the visual effects of the development.

1.1.145 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

1.1.146 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would involve large-scale construction, operational, and decommissioning activities extending over several decades, introducing sustained disturbance into this ecologically sensitive environment.

Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable. The long-term nature and scale of the development could disrupt key ecological functions, necessitating thorough assessment and mitigation to address the sensitivity of the site and its surrounding marine ecosystem.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area, particularly concerning the guillemot population. These documents are specifically prepared for circumstances where it cannot be definitively ruled out that the development would harm the protected site. Their inclusion in the application therefore signals that the applicant recognises the possibility that the proposed development may have significant environmental impacts requiring mitigation.

Importantly, the submission of these derogation and compensation documents serves a procedural and substantive function within the planning process. It indicates that the applicant has sought to comply with the necessary legal and policy frameworks governing protected sites, by proposing measures intended to address and offset any potential harm. However, this does not represent a definitive conclusion on the absence of adverse effects. On the applicant's own approach, there remains scope for the Scottish Ministers to reach a differing view regarding the likelihood or extent of any impacts on site integrity, which may influence the ultimate determination of the application.

In light of this, while the submission of these documents demonstrates an awareness and preliminary attempt to manage environmental risks, it also underscores the unresolved nature of the assessment of effects on the protected guillemot population. The application must therefore be carefully scrutinised to ensure that any potential adverse effects are fully considered and that any proposed compensation measures are robust, proportionate, and deliverable. Only through such a thorough approach can appropriate protection of the Special Protection Area be secured in accordance with planning policy and statutory obligations.

Consent for developments affecting protected habitats and species can only be granted where it is conclusively demonstrated that there will be no adverse effect on the integrity of the protected site, unless the strict derogation tests under the Habitats Regulations are satisfied. The competent authority must be certain that no reasonable scientific doubt remains regarding the proposal's impacts. This high evidential standard places the burden of proof firmly on the applicant. Importantly, mitigation measures, compensation proposals, and future monitoring arrangements alone do not suffice to meet the statutory requirements. This legal framework is reinforced by the Habitats Regulations and is further engaged through relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f). In summary, planning consent in these circumstances demands robust, unequivocal evidence that statutory tests are fully satisfied before permission may lawfully be granted.

The applicant's submissions, including the derogation documents provided, reveal a fundamental shortfall in demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. This failure is evidenced by the lack of sufficient certainty that the requisite legal protections will be upheld. Without clear and convincing evidence that these tests can be satisfied, the proposed mitigation measures remain unproven and, by extension, unreliable as a means to protect the ecological features of international significance.

This deficiency undermines the case for granting consent, as adherence to the statutory tests is a legal prerequisite for development affecting such sensitive environmental assets. The applicant's inability to meet these tests calls into question the soundness of the application and suggests that proceeding with approval would be inconsistent with the statutory framework intended to prevent harm to internationally important ecological interests. Consequently, the application should not be permitted to advance without satisfactory demonstration that all legal requirements have been fully addressed.

1.1.147 Cumulative and In-Combination Effects

The current planning application before the Scottish Ministers addresses only a portion of the overall development, specifically excluding the export cable corridor and onshore transmission works, which are essential components without which the wind farm cannot function. These elements are deferred to separate, subsequent applications. Consequently, the environmental and planning effects of the entire project are never collectively assessed at a single point in the consenting process. This fragmented approach results in important aspects of the development being considered only after the principal decision has been made.

This manner of project assessment is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment. The courts have affirmed that a project must be evaluated in its entirety rather than being segmented into smaller parts whose individual impacts may appear less significant. By effectively "salami-slicing" the project, the current approach prevents a comprehensive evaluation of the cumulative effects, undermining the integrity of the decision-making process. Therefore, the assessment methodology applied here is procedurally and legally flawed, rendering the current consent process incomplete and insufficient.

1.1.148 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient environmental information to make a fully informed decision on the application. The assessment fails to adequately investigate all identified pathways to significant effects, relying instead on methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks a place-based analysis of the islands directly affected.

Furthermore, the application depends in some instances on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding issues. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be understood before the application is determined. The regulatory framework is clear that these matters must be resolved through the evidence presented at the time of decision-making, not deferred to a later stage.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to discharge their statutory duties. Without sufficient and comprehensive evidence, there is a risk that the decision will be made without a full understanding of the environmental impacts, which undermines the purpose of the EIA process and the statutory requirements it seeks to uphold.

1.1.149 Effects on Local Area

The proposed development encompasses a substantial area of 448 square kilometres immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands. Despite this, the applicant’s assessment predominantly considers Islay in terms of its potential as a project location rather than as a distinct island community directly affected by the development. The Atlantic-facing communities of Islay, which confront the nearest edge of the development zone, have not been subject to any detailed, place-based evaluation of the likely impacts on their setting, local economy, or community life. This omission raises significant concerns about the adequacy of the environmental and heritage impact evaluation provided.

Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the proposed array, are similarly underassessed. The North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and is central to the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations at these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, is situated within this community, yet the identified deficiencies in the heritage assessment apply equally to its open maritime setting. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall impact assessment.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, and attributes these effects a Medium magnitude. Specifically, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the 30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs

National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant’s assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

The applicant’s assessment fails to consider significant effects on several mainland and island communities whose direct views and economic interests are closely tied to the seascape within the proposed development area. Notably, Gigha—a community-owned island renowned nationally for its regeneration—faces the development site from the east, yet the impact on its delicate community balance and economy remains unexamined. This omission undermines the thoroughness of the assessment.

Similarly, Ardnamurchan Point, the most westerly location on the British mainland, offers panoramic vistas along the Hebridean seaboard that attract visitors throughout the peninsula. These exceptional seaward views constitute receptors of a highly sensitive nature, yet the applicant’s reliance on distance-based moderation in their analysis disregards their importance. The west coast of Kintyre presents a comparable case, where a sequence of communities derives its character and visitor economy from outlooks towards Islay, Jura, and the open Atlantic waters beyond. The Treshnish Isles and adjacent small islands and mainland coasts with direct views to the development area share this vulnerability.

Given the substantial roles these visual and economic connections play in defining local community identity and sustainability, the absence of their consideration in the assessment compromises its comprehensiveness and validity. A proper evaluation of these receptors is essential to ensure that potential adverse effects are appropriately understood and mitigated.

1.1.150 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Firstly, the seabird colonies of the Treshnish Isles, Staffa, Colonsay and Oronsay, all within foraging range of the development area. Revised BTO foraging range estimates (Woodward et al., 2019) more than doubled previous figures for six species including Manx shearwater, kittiwake, razorbill and puffin, meaning any connectivity screening based on older assumptions understates the number of designated sites in play. Baselines are also depressed following the 2020–23 avian influenza outbreak, so predicted mortality represents a larger proportional impact on a recovering population than raw figures suggest. The National Trust for Scotland, which cares for Staffa and the Treshnish Isles, has objected on precisely these grounds.

Second, the Sea of the Hebrides Nature Conservation MPA; the world's first designated for basking shark and the UK's first for minke whale, alongside the Inner Hebrides and the Minches SAC for harbour porpoise. Evidence on entanglement risk from mooring lines and dynamic cabling at this scale is thin, and Ministers carry a statutory duty to further these sites' conservation objectives.

Third, the seascape and dark skies of Iona, the Ross of Mull and Colonsay. Iona is a site of international pilgrimage whose value rests on an uninterrupted western horizon. Turbines of 340 metres, roughly 13 miles from Iona and under 8 from Colonsay, with aviation lighting on up to 144 structures, would permanently alter both the daytime and nocturnal character of these islands. No comparable development sits this close to inhabited communities anywhere in the UK.

Finally, I would also ask the Scottish Ministers to consider: The socio-economic assessment cannot be evidenced. Argyll and the Isles draws around 490,000 overnight visits and £165 million in visitor spend annually, but no disaggregated tourism data exists for Mull and Iona (a gap the local Destination Management Organisation has already raised formally with the Scottish Government). A developer-commissioned assessment reporting no significant tourism effect is describing an absence of data, not an absence of harm. These islands depend on the visitor economy far more acutely than the regional average, and wildlife tourism here is doubly exposed: to the visual change, and to the ecological one.

I would also ask whether an Islands Communities Impact Assessment has been prepared under the Islands (Scotland) Act 2018, and if not, on what basis.

Finally, the wider policy context. In 2025, Scottish wind farms were paid approximately £343 million to switch off, 94% of Great Britain's total curtailment cost, with 39% of northern Scotland's potential output never reaching the grid. Meanwhile the Scottish Government's 2GW community and locally owned energy target stands at roughly 1.1GW, of which only around 0.1GW is genuinely community-owned, and about 0.2% of Scotland's wind capacity is in shared ownership. Communities are asked to host infrastructure of unprecedented scale in exchange for a community benefit fund of undeclared value, arriving around 2033.

On Iona, 92% of responding households objected, almost all while stating explicitly that they support renewables and net zero. These islands are not obstructing the transition. They are asking to be part of it rather than subject to it.

1.1.151 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own assessment acknowledges substantial impacts on nationally designated landscapes, as well as on the coastal communities and heritage. However, independent evaluations of the submitted documents reveal that these impacts have been understated. Notably, the necessary heritage assessment has not been completed, and while effects upon the island communities were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological safeguards required by law have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, alongside the associated marine licence. Should the Ministers consider otherwise, it is requested that they

require the submission of further environmental information and enhanced visualisations. Moreover, the determination of the applications ought to be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection receive thorough examination. Regardless of the outcome, it is further asked that the Ministers provide explicit conclusions within their decision that address the effects upon cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 116
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm project, which is subject to application reference numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, an application for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded, that I am listed as an objector, and that I receive notification of the outcome of these applications.

The proposals envisage the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The scheme comprises between 91 and 144 wind turbines, each with a maximum height of up to 335 metres to blade tip. The wind farm would be situated within a designated Windfarm Development Area extending over some 448 square kilometres of marine space. This area lies to the north-west of the island of Islay and to the west of Colonsay, approximately 21 kilometres from Iona, and lies in close proximity to various islands and coastal settlements within the southern Hebrides.

The following sections of this document articulate the grounds for objection based upon planning and environmental considerations, framed within the statutory and policy context that governs these applications. It is important to emphasise that the onus lies squarely with the applicant to provide sufficient evidence demonstrating that all relevant statutory tests and policy requirements are met. Objectors are not obliged to prove the contrary. In this instance, the evidence submitted by MachairWind Limited fails to satisfy the necessary criteria, and consequently, planning consent and the marine licence should be refused.

1.1.152 Seascape, Landscape and Visual Effects

The applicant’s evidence acknowledges that the development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the proposed 35-year operational life. This impact is not limited to the operational timeframe, as consenting to the development effectively designates this seascape as suitable for wind farm use, establishing a lasting precedent in policy terms. Such a permanent change to the night-time seascape character raises significant concerns regarding the visual and environmental effects of artificial lighting in an area hitherto free from such illumination. Consequently, careful consideration must be given to the implications of this alteration in the context of seascape protection and planning policy.

The applicant acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal's conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.153 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts, while adopting Historic Environment Scotland's recognised methodology, falls short in its application and undermines confidence in its conclusions. The methodology requires a clear evaluative process to determine whether changes to the setting affect the contribution that setting makes to the cultural significance of historic assets, and whether the integrity of that setting is adequately retained. Crucially, it distinguishes between mere visual change and actual adverse impact, avoiding a direct equation of visibility with harm. This nuanced approach is designed to ensure that assessments reflect the true significance of setting rather than superficial or solely visual considerations.

However, the operational assessment provided by the applicant, as examined in a published Methodological Audit, does not demonstrate that this evaluative step has been properly undertaken. The assessment focuses extensively on describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but fails to show how these observations translate into an evaluation of the integrity of setting in accordance with the methodology. The Audit notes that although the applicant concludes the integrity of setting is adequately retained, this conclusion is not supported by a transparent or systematic assessment process. Without this critical evaluative stage, the reliability of the assessment's findings on heritage impacts is fundamentally compromised.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The practical consequence of the identified deficiencies in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be

regarded as fully reliable. This is because the heritage conclusions are directly dependent on the landscape assessment. Any understatement of landscape effects inevitably leads to a corresponding understatement in the assessment of heritage impacts.

It is therefore essential to recognise that if the landscape effects have been minimised or overlooked, the heritage assessment built upon these findings will inherit the same shortcomings. This interdependency means that the overall evaluation of the proposal's impact on heritage assets is compromised by the initial landscape analysis.

In light of this, the credibility of the heritage impact conclusions is fundamentally undermined. A robust and accurate landscape assessment is a prerequisite for a sound heritage impact appraisal, and without it, the conclusions presented must be treated with caution.

The applicant's submission engages directly with National Planning Framework 4 (NPF4) Policy 7, specifically subsection (h) concerning scheduled monuments, as well as subsections (c) and (d) relating to the settings of heritage assets. This is further supported by compliance requirements under Policy GEN 6 and the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for the protection of internationally and nationally important cultural heritage assets and their settings within the planning process.

However, the application fails to satisfy these policy requirements. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of the identified heritage assets and their settings will be preserved. Moreover, the Scottish Ministers are not presented with the necessary assessment or conclusion to verify that such protection will be achieved. This omission undermines the acceptability of the application, as it does not meet the established policy standards for heritage protection. Consequently, the proposal cannot be considered compliant with the relevant statutory and policy obligations designed to safeguard these important heritage assets.

1.1.154 Effects on Island Communities, Tourism and the Local Economy

Although mitigation measures are proposed, they fail to adequately address the fundamental threat posed by the development to the qualities that underpin the island communities' economies. These communities rely exceptionally heavily on visitors who are drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness—qualities identified in the applicant's own baseline assessments. Any alteration to these attributes directly undermines the economic foundations of these islands, which in turn jeopardises local services, population stability and the long-term viability of the communities themselves. Consequently, the proposal represents a significant risk to the essential economic and social sustainability of the island populations.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities.

Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

The applicant acknowledged that island communities require particular scrutiny but failed to undertake the necessary assessment to understand the effects of the proposal upon them. This omission means that it has not demonstrated compatibility with sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This shortfall is significant in light of the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, the proposal does not comply with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be assessed and given due weight through meaningful engagement from the inception of a project to its conclusion. In the absence of such rigorous assessment and engagement, the proposal does not meet the required planning and statutory standards for protecting island communities.

1.1.155 Ecology, Biodiversity and Habitats Regulations

The proposed development raises significant concerns due to the presence of Priority Marine Features and Annex I habitats within the site itself. This ecological sensitivity is compounded by the surrounding waters, which provide habitat for a range of protected species including seabirds, marine mammals, and basking sharks. Such environmental assets are of considerable conservation importance and warrant thorough consideration in the planning process.

The scale and duration of the proposed activities further intensify these concerns. Construction, operation, and eventual decommissioning are set to occur over several decades, introducing substantial disturbance into a highly sensitive marine environment. The potential for significant adverse environmental effects cannot be overlooked, particularly given the cumulative impacts that long-term, large-scale development may impose on these vulnerable species and habitats.

In light of these factors, careful assessment and robust mitigation strategies are essential to ensure that the ecological integrity of the site and its surroundings is maintained. Without clear evidence demonstrating that the proposal will not cause unacceptable harm to Priority Marine Features and protected marine species, there remains considerable uncertainty about the environmental acceptability of the development as currently proposed.

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when there is a possibility that the project may have an adverse effect on the integrity of a protected site. Their inclusion in this application indicates the applicant's recognition of potential impacts that cannot be definitively ruled out. Importantly, the submission of these documents also acknowledges that the Scottish Ministers might ultimately reach a different conclusion regarding the presence of adverse effects. In this context, the applicant's approach demonstrates an awareness of the sensitivities involved and provides a framework for mitigation and compensation measures should they be deemed necessary. This reflects a responsible stance, though the final determination of adverse impact remains subject to ministerial assessment.

The practical consequence of the legal framework governing developments affecting protected habitats is that consent cannot be granted unless it is unequivocally demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement is absolute under the Habitats Regulations, which stipulate that no reasonable scientific doubt can remain regarding potential impacts. As such, the competent authority must be fully satisfied before consent is issued, reflecting the high evidential standard demanded by law.

This legal test is supported by key planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. These policies collectively reinforce the necessity for rigorous assessment and the precautionary approach embedded in the Habitats Regulations. They ensure that environmental protection is paramount in the decision-making process concerning developments potentially affecting protected habitats and species.

It follows that the responsibility to meet these stringent requirements lies entirely with the applicant. Demonstrations relying solely on mitigation measures, compensation schemes, or proposals for future monitoring are insufficient to satisfy the statutory tests. Only clear, definitive evidence that adverse effects will be avoided can lawfully justify consent. Without such evidence, consent must be refused to uphold the integrity of protected sites and comply with the comprehensive legal and policy framework.

The applicant's submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant's documentation itself. This failure directly

undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant’s inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.156 Cumulative and In-Combination Effects

The current approach to assessing the proposed development is fundamentally flawed when compared to established principles of project evaluation and mitigation. Mitigation measures rely on a full understanding of the project's cumulative impacts, yet in this case, only a portion of the development—the wind farm itself—is before the Scottish Ministers. Critical components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are deferred to separate, subsequent applications. This piecemeal consideration prevents a holistic appraisal of the project's overall effects and undermines the ability to implement effective and comprehensive mitigation strategies.

This fragmented assessment approach runs counter to the legal precedent set in Raeshaw Farms, which affirms that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual impacts appear less significant. By deferring key elements to later consenting processes, the decision-making body is unable to consider the full scope of environmental and other impacts at the principal decision stage. Consequently, the assessment is incomplete and procedurally unsound, as it denies a proper cumulative evaluation and impairs informed decision-making on the project as a whole.

The cumulative impact assessment relies directly on the findings of the underlying Environmental Impact Assessment, including the landscape, heritage, and socio-economic evaluations. As these foundational assessments have been demonstrated to understate the effects, the cumulative assessment consequently adopts this diminished baseline. This results in an overall underestimation of the combined impacts arising from the proposed development in conjunction with other existing, consented, and foreseeable projects. Therefore, the cumulative effects reported cannot be considered reliable or reflective of the true extent of impact.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.157 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the weight the Scottish Ministers are asked to place on the site-selection process renders the quality of public participation in that process directly material. However, significant deficiencies in participation during both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case. Furthermore, GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, require that those affected have a realistic opportunity to engage with decisions of this magnitude. The conditions imposed on the affected communities fall short of this standard, thereby undermining the legitimacy of the site-selection process. It is therefore imperative that Ministers give due regard to these deficiencies when considering the representations made.

The Environmental Impact Assessment submitted with this application fails to provide sufficiently robust evidence to enable the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across various topics, it does not investigate these impacts comprehensively. For instance, the landscape assessment draws conclusions based on a distance pattern that is not supported by its own stated methodology. Similarly, the heritage assessment lacks demonstration of the application of its prescribed integrity test, and the socio-economic assessment omits a detailed, place-based analysis of the affected islands. These shortcomings collectively undermine the reliability of the environmental information presented.

Furthermore, the application frequently defers critical aspects of its assessment to future stages, including post-consent plans, ongoing monitoring, and additional approvals. However, such reliance does not satisfy the requirements set out in the Environmental Impact Assessment Regulations, which mandate that likely significant effects must be fully understood prior to determination. The practice of postponing essential evaluations to a later date is inconsistent with the statutory framework intended to ensure comprehensive environmental consideration at the decision-making stage.

In conclusion, the Scottish Ministers are obliged to base their determination on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed in the future. Given the deficiencies identified, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards. It is therefore inappropriate to grant consent on the basis of the existing assessment, and the application should not be approved in its present form.

1.1.158 Effects on Local Area

The applicant’s assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west

of Colonsay. However, the assessment predominantly considers Islay in terms of its potential role as a direct project location rather than as an affected island community in its own right. This approach overlooks the proximity of the development's Atlantic-facing edge to Islay's communities and neglects any place-based evaluation of the effects on their setting, economy, or community life within the 448 square kilometre development zone. Such an omission significantly undermines the reliability of the environmental and heritage impact evaluation, given the integral relationship between these communities and their maritime environment.

Colonsay and Oronsay are similarly impacted, with their daily life defined by a seaward outlook facing the development array directly. The North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is the focus of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. These gaps further call into question the thoroughness and accuracy of the applicant's evaluation of direct and significant effects on the heritage and environment of these islands.

The applicant's own Coastal Character assessment recognises that the Sound of Iona is of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The overall effect is classified as Moderate and Significant, impacting an area approximately 21 kilometres away, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. This demonstrates that the scale of visual impact is substantial and geographically extensive.

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment of impacts on wider seaboard designated landscapes and island communities notably underestimates the significance of effects when compared to established mitigation considerations. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is intrinsically linked to the preservation of the unspoilt seascape and setting, yet no specific assessment of effects on Ulva has been provided. This omission is critical given Ulva's reliance on the very qualities at risk. Similarly, Staffa, another island within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessment. Despite acknowledging the panoramic maritime qualities present, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's recognised value.

Further scrutiny reveals a comparable pattern in the assessment of other designated landscapes. The Jura National Scenic Area, designated partly for its wild and undeveloped Atlantic outlook, is assessed at High sensitivity but attributed only Medium to Low magnitude of impact due to distance and retained landforms, approximately 28 to 32 kilometres away. The Scarba, Lunga and the Garvellachs National Scenic Area, located roughly 35 to 40 kilometres from the development, receives a similar evaluation. This approach tends to discount the cumulative and

qualitative importance of these seascapes' wild character, thereby diminishing the perceived significance of potential impacts. Taken together, these factors demonstrate that the applicant's assessment fails to fully account for or mitigate significant effects on both important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment notably understates the magnitude of change experienced on Tiree when compared to the level of sensitivity attributed to the island's landscape. While the South Tiree coastal area is correctly identified as having High sensitivity at approximately 35 kilometres, it is paradoxically assigned a Low magnitude of change. This assessment fails to account adequately for Tiree's exceptional landscape character, which is defined by its exceptionally low-lying topography and the dominance of sea and sky. With the highest point, Ben Hynish, standing at only 141 metres, the introduction of turbines reaching up to 335 metres would create unprecedented vertical structures within the seascape. Given that Tiree's character depends on an open oceanic horizon, the presence of such large turbines would cause a significant and conspicuous change. Therefore, the conclusion of a Low magnitude of change for such a highly exposed and sensitive receptor is an understatement and renders the overall evaluation of effects unreliable.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share this position. The absence of targeted assessment for these locations undermines confidence in the applicant's conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant's reliance on a distance-based approach to assess environmental effects results in a systematic underestimation and discounting of significant impacts on sensitive receptors located beyond 20 kilometres from the development site. This methodological choice has a practical consequence: important changes experienced

by these distant communities are not given appropriate weight in the environmental impact assessment. Consequently, the assessment does not accurately reflect the true extent or significance of effects that occur beyond this arbitrary distance threshold.

In examining the evidence, it becomes clear that wherever the applicant's assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is deliberately moderated and the effect discounted. This means that although these receptors may be affected to a considerable degree, the assessment process effectively diminishes their experience of impact. Such an approach fails to provide a comprehensive or place-specific analysis for these communities, thereby compromising the assessment's integrity and robustness.

The absence of a place-based assessment for communities beyond 20 kilometres undermines the environmental impact assessment's ability to fully inform decision-makers and the public. Without acknowledging and properly evaluating the effects experienced by these sensitive receptors, the applicant's approach risks overlooking meaningful environmental and social consequences. It is therefore essential that the assessment methodology be revised to accurately capture and weigh the significance of effects at all relevant distances, ensuring a thorough and credible evaluation.

1.1.159 Personal Observations

In addition to the planning matters above, I am personally concerned because: Building a windfarm in this area would have a devastating impact on Iona, the surrounding islands & the wildlife. This is an unspoilt marine environment held sacred by millions. This is the wrong project in the wrong place.

Based on my own local knowledge, I also wish to highlight that: The island of Iona is an area of outstanding natural beauty and home to a variety of wildlife. It is also a sacred site for Christians. People from all over the world travel here for peace, tranquility & spiritual reasons. This plan to build a wind farm would ruin this area & cause irreversible damage to the environment, the community & the repercussions would be felt around the world.

Finally, I would also ask the Scottish Ministers to consider: You must reject this proposal. This windfarm will cause devastating, irreparable damage to the environment & the communities living here. Our planet is in grave danger. Don't make it worse.
People from all over the world travel to the west coast for the wildlife, peace, tranquility, unspoilt views & dark skies. You will ruin this if you let this go ahead. The money won't stay in the Hebrides but the damage will. Oppose this proposal.

1.1.160 Further Comments

Do not sacrifice our most precious landscape for energy production that is not needed.

1.1.161 Summary

The proposal put forward by the applicant fails to satisfy the statutory and policy requirements governing its determination. Their own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as the cultural heritage and communities along this coastline. Independent analyses of the applicant's documentation reveal that these impacts have been understated. Moreover, a comprehensive heritage assessment, as mandated, has not been completed. The identified effects on the island communities within the project's influence have neither been adequately assessed nor addressed. Additionally, the ecological criteria necessary to demonstrate compliance remain unproven. It is also pertinent that only a portion of the overall project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal and reject the associated marine licence application.

Should the Scottish Ministers be inclined not to refuse consent outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Furthermore, it is essential that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 117
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, associated with application 00012385 for consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that my objection be officially recorded and that I am informed of the outcome of the determination process.

The proposal concerns the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 wind turbines, each with a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. This site lies to the north-west of Islay and to the west of Colonsay, at an estimated distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, structured around the statutory and policy frameworks governing the assessment of these applications. It is incumbent upon the applicant to furnish robust evidence demonstrating compliance with all relevant statutory tests. The onus does not rest upon objectors to disprove these claims. Having considered the submissions, it is clear that the applicant has failed to meet this evidential burden. Accordingly, the applications should be refused consent.

1.1.162 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence provided does not establish that the applicant has adequately considered these critical factors, nor does it confirm that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. This omission represents a fundamental deficiency in the application’s assessment and undermines the statutory framework designed to safeguard these valued environmental and heritage assets.

Furthermore, the Scottish Ministers, as the determining authority, are mandated to have regard to the same statutory duties under Schedule 9. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the evidence, directly conflicts with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for this proposal. The application’s inability to satisfy these statutory requirements constitutes a clear procedural and substantive defect that must be addressed before any approval can be considered lawful or appropriate.

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, this application must demonstrate full compliance with the General Policies that are directly applicable to the proposal. These include GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. The application, however, does not provide sufficient evidence to confirm adherence to these policies, which is a fundamental requirement for lawful determination.

The absence of demonstrated compliance with these policies constitutes a significant deficiency in the application. The evidence submitted fails to adequately address the potential impacts on the historic environment, landscape character, natural heritage, and cumulative effects, as required by the National Marine Plan. Furthermore, the application does not meet the standards for engagement and sound evidence as prescribed by GEN 18 and GEN 19, undermining the robustness and reliability of the assessment. These omissions and shortcomings represent clear conflicts with the applicable legal and policy framework, which must be given substantial weight in the decision-making process.

Given these unresolved deficiencies and the failure to meet the statutory and policy requirements, the application cannot be considered compliant with the Marine (Scotland) Act 2010 and the National Marine Plan. As established by the statutory assessment criteria, where compliance has not been demonstrated or where evidence identifies such conflicts and omissions, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the necessary legal and policy obligations.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the evidence submitted does not adequately demonstrate how this proposal will achieve such outcomes. Similarly, under Policy 4, the proposal must safeguard natural places, but the application lacks sufficient detail or measures to ensure the protection of these environments. Policy 7 mandates the conservation and enhancement of historic assets and places; however, the proposal fails to provide convincing evidence that these heritage considerations have been properly addressed or that any adverse impacts will be avoided or mitigated. Finally, Policy 11 on Energy requires that developments contribute positively to energy objectives, but the application does not satisfactorily show compliance with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of demonstrated conformity with these critical NPF4 policies, the proposal should be refused planning permission.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making process is not informed by a full understanding of the environmental consequences, contrary to statutory requirements.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority reveals deficiencies and omissions in demonstrating compliance with these legal obligations. Where such compliance has not been demonstrated, the law and policy framework dictate that these shortcomings must weigh against the granting of consent. Consequently, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The applicant’s submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight during the decision-making process. This obligation is clearly set out in the Act and is fundamental to ensuring that development proposals affecting island communities are assessed in a manner consistent with the legal framework.

However, the evidence before the determining authority fails to demonstrate compliance with this statutory duty. There is no clear indication that the interests of the relevant island communities have been properly identified, considered, or weighed in the planning assessment. The absence of such consideration constitutes a significant procedural deficiency and a failure to meet the requirements of the Islands (Scotland) Act 2018.

Furthermore, where compliance with this statutory duty has not been demonstrated, or where the evidence reveals omissions or conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. In this case, the lack of proper consideration of island community interests represents a material conflict with the statutory framework and undermines the legitimacy of the decision-making process.

In conclusion, the proposal fails to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018. This failure constitutes a substantive deficiency that weighs against the granting of planning consent.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in the application, as the evidential burden rests squarely with the applicant to prove that all legal and policy frameworks have been satisfied. The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, directly conflicts with the applicable legal and policy framework. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis that the applicant has not fulfilled the necessary evidential responsibility to prove compliance, the application should be refused.

1.1.163 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. Although NPF4 Policy 11 endorses renewable energy projects, this support is expressly conditional upon adherence to its impact criteria, including Policy 11(c) relating to impacts on communities, as well as Policies 11(d) and 11(e) concerning effects on landscape, seascape, and other receptors. A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that the safeguarding of island communities would be ensured. In addition, the ecological assessments submitted do not provide sufficient evidence to conclude that the necessary ecological tests can be satisfied. Taken together, these shortcomings indicate a clear conflict with the impact criteria of NPF4 Policy 11, calling into question the acceptability of the development as currently proposed.

In considering the proposal against the relevant policies within the National Planning Framework 4, it is apparent that the mitigation measures put forward do not adequately address the protections afforded to designated assets. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, establish a comprehensive framework for protection. The evidence shows that the proposed development would cause significant adverse effects to these nationally designated landscapes and seascapes, and the mitigation proposed falls short of preventing such harm.

Moreover, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor has it shown that the interests of island communities would be adequately safeguarded. Crucially, the ecological assessments fail to meet the necessary tests outlined in Policy 3, with no convincing evidence that biodiversity impacts can be effectively mitigated. Taken together, these shortcomings confirm that the proposal conflicts with the suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These elements are fundamental to the local environment and identity, and their protection is a clear objective of the relevant policies. The proposal's impacts run contrary to these aims, resulting in tangible harm to the area's character and valued assets.

This conflict with the development plan framework is significant and cannot be overlooked. The proposal fails to align with the policies set out in the Argyll and Bute Local Development Plan 2 that are material to land-based effects, underscoring an inconsistency with the established planning framework. Furthermore, this discord extends to the National Planning Framework 4 when considered in its entirety, which the applicant has not successfully rebutted or mitigated through their submissions.

In conclusion, the proposal's adverse effects and policy conflicts demonstrate that it is not supported by the terrestrial development plan framework. Given the clear and substantive nature of these inconsistencies, the proposal should be regarded as contrary to the planning policies designed to protect the landscape, heritage, and community interests of Argyll and Bute. It follows that the proposal should be refused on these grounds.

1.1.164 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the reliability of the applicant's assessment methodology, particularly in how distance thresholds are applied to determine the magnitude of effects. The methodology outlined in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nonetheless, an independently prepared Evidence Note, based solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This finding is further corroborated by the applicant's own documents, which acknowledge distance as a key factor in their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. The practical effect of this approach is that the protective tests are applied to inputs that systematically understate magnitude at precisely the distances where the most sensitive designated landscapes are located. Consequently, the conclusions presented cannot be relied upon to accurately describe the effects that the Scottish Ministers are being asked to consent.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot's visualisation guidance, which is a recognised standard, these materials inherently lack the capacity to fully convey the true scale and effect of the

development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

While mitigation measures might be considered to address lighting impacts, it is important to recognise that the introduction of aviation and navigation lighting will inevitably and permanently alter the character of the night-time seascape. Currently, the sea horizon in question remains unlit, and the proposed development would introduce such lighting for the full 35-year operational lifespan of the wind farm. This change is not merely a temporary inconvenience; rather, it represents a fundamental transformation of the seascape's visual qualities during nighttime hours. Moreover, this operational timeframe does not limit the policy harm. Granting consent for this development effectively signals that the seascape is deemed appropriate for wind farm use despite the significant and enduring alteration to its night-time character. Consequently, the impact on seascape character and the associated lighting effects warrant careful consideration in light of relevant planning policies before any approval is granted.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has not adequately demonstrated that its assessment of the scale of the accepted effects aligns consistently with its own stated methodology. This inconsistency raises doubts about the reliability of the conclusions presented and undermines confidence in the assessment's findings.

Moreover, the proposal fails to establish compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Given this lack of demonstrated conformity, it is evident that the proposal does not meet the requisite policy standards, and accordingly, it should not be supported.

1.1.165 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's recognised approach—developed and refined through consultation with that body—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

While the applicant's assessment recognises certain mitigation measures aimed at reducing harm to heritage assets, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that confer significance. The baseline evidence acknowledges that the cultural value of the affected heritage assets is not solely derived from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. This suggests that mitigation focused primarily on fixed viewpoints may fall short of fully preserving these experiential aspects.

Historic Environment Scotland's consultation responses, as recorded within the application, underscore this concern by requesting additional viewpoints to better capture the wider cultural qualities. Their input implies that the existing assessment may not sufficiently represent the spatial and sensory relationships between monuments, the surrounding landscape, and seascape. Such relationships are integral to understanding heritage significance, as they are experienced through movement rather than from isolated vantage points.

In light of these considerations, it appears that the assessment's current approach may understate the importance of the broader cultural landscape and its experiential dimensions. Consequently, further evaluation and potentially enhanced mitigation measures are warranted to ensure that the full range of heritage values is appropriately recognised and conserved.

The heritage impact conclusions presented in the application are fundamentally reliant on the underlying landscape assessment. It is evident that where the landscape effects have been understated, as previously demonstrated, any heritage conclusions derived from this assessment consequently reflect the same

understatement. This dependency indicates a cascading effect whereby inaccuracies or minimisations in the landscape evaluation directly compromise the reliability of the heritage impact findings.

Given this interdependence, the credibility of the heritage conclusions is significantly undermined. Without a robust and accurate landscape assessment, the heritage impacts cannot be properly understood or mitigated. Therefore, the planning considerations should not accept the heritage conclusions at face value but rather recognise that their foundation is flawed, necessitating a more thorough and transparent appraisal to ensure that all effects are appropriately identified and addressed.

There remains significant uncertainty regarding the application's compliance with essential policy requirements for heritage protection. Specifically, the proposal engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets, together with their settings, will be adequately protected. Crucially, Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. This lack of robust evidence undermines confidence in the application's acceptability and weighs against its approval.

1.1.166 Effects on Island Communities, Tourism and the Local Economy

The proposed development presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn specifically by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation upon which these communities depend. Such an impact would extend beyond immediate economic concerns, jeopardising local services, resident populations and the long-term viability of these island communities. It is therefore essential to consider carefully how this proposal could erode the very factors that sustain these unique and vulnerable places.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, giving detailed consideration to potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

It is important to recognise that small island economies cannot be adequately represented by regional averages. Their economic structures are often concentrated in sectors that are directly vulnerable to alterations in the environmental and social

qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers tends to deepen these communities' dependence on the qualities that may be at risk from the proposal. Therefore, concluding low sensitivity without a tailored place-based analysis does not constitute robust evidence but instead amounts to an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology appears fundamentally flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced, locality-specific approach is necessary to capture the true nature of potential effects and to inform appropriate planning decisions. Without this, the assessment risks overlooking significant socio-economic vulnerabilities inherent to these island settings.

The applicant acknowledges that island communities warrant particular scrutiny but has failed to undertake the necessary assessment to understand the effects of the proposal upon them. This omission means that the proposal does not demonstrate compatibility with sustainable island communities, nor does it show that the statutory duties owed to those communities have been fulfilled. The proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which require decisions to be based on sound socio-economic evidence and to adopt a precautionary approach where such evidence is lacking. Moreover, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be assessed and given due weight through meaningful engagement from the inception to the conclusion of any proposal. Given the absence of adequate assessment and meaningful engagement, the proposal fails to meet these essential planning and statutory standards for protecting island communities.

1.1.167 Ecology, Biodiversity and Habitats Regulations

The proposed development area encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and importance. Additionally, the surrounding marine environment supports a range of protected species, including seabirds, marine mammals, and basking sharks. Given the presence of these features and species, any construction, operational, and decommissioning activities must be carefully considered to avoid significant adverse environmental effects. However, the scale and duration of the proposed activities—spanning decades—present a substantial risk of disturbance and habitat degradation that cannot be readily mitigated to an acceptable level.

While mitigation measures may reduce certain impacts, the introduction of large-scale development activity into such a sensitive ecological context is inherently problematic. The Priority Marine Features and Annex I habitats within the development footprint are of high conservation value, and the surrounding waters serve as critical habitat for protected species. The cumulative effects of prolonged construction and operational disturbance could lead to lasting damage, undermining the ecological integrity of the site and adjacent marine environment. Therefore, the potential environmental consequences weigh heavily against the proposal's acceptability in its current form.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant's decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant's own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

The applicant's evidence clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future actions. This framework underscores the necessity for the competent authority to exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally

undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.168 Cumulative and In-Combination Effects

The current planning assessment process for the project is fundamentally flawed due to its fragmentation of the development into separate parts. According to established evidence, only a portion of the overall project is presently before the Scottish Ministers, specifically excluding critical components such as the export cable corridor and onshore transmission works. These elements are essential for the operational viability of the wind farm but have been deferred to future applications. This means that the environmental and cumulative effects of the entire project are never evaluated in a comprehensive manner at the time of the principal decision. The consequence is a piecemeal consideration of the project's impacts, undermining the integrity of the assessment process.

This approach runs counter to established legal principles, as affirmed in the court decision in Raeshaw Farms, which emphasises that a project must be assessed in its entirety rather than being "salami-sliced" into smaller parts whose individual effects may appear less significant. By deferring key components to subsequent consenting procedures, the decision-making body is precluded from considering the full scope and scale of potential impacts at once. Such fragmentation not only risks underestimating cumulative effects but also diminishes transparency and undermines public confidence in the planning process. Accordingly, the assessment must be reconsidered to encompass all elements of the project collectively to ensure a lawful and robust evaluation of its impacts.

The cumulative impact assessments rely fundamentally on the findings of the underlying Environmental Impact Assessment. As noted in the submitted evidence, where the baseline evaluations for landscape, heritage, and socio-economic factors understate the extent of effects, the cumulative assessment consequently adopts this diminished baseline. This approach results in an understatement of the combined impacts when considering this proposal alongside other existing, consented, and foreseeable developments. Therefore, the reliability of the cumulative impact assessment is compromised, leading to an overall underestimation of the true scale of combined effects.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. This omission undermines the integrity of the environmental impact assessment process and prevents a comprehensive understanding of the potential effects. It is therefore essential that the treatment of the deferred works be explicitly considered and addressed within the determination to ensure compliance with relevant planning policies and regulatory obligations. In conclusion, without this explicit consideration, the proposal does not meet the necessary standards for informed decision-making and should not be approved in its current form.

1.1.169 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has been fundamentally compromised by significant deficiencies in public participation, directly affecting the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place considerable weight on that process; however, the quality of engagement at both the plan and site-selection stages has been inadequate and has persisted into the application stage. Notably, the application itself comprises many thousands of pages of complex technical material, which local island communities have been expected to review within a consultation period coinciding with their busiest working months. This timeframe aligns with the visitor season, during which residents are continuously occupied and access to specialist advice is at its lowest. In contrast, the applicant has had years to prepare its case, supported by substantial professional expertise and financial resources, creating a marked imbalance in the ability to participate effectively.

Furthermore, the requirements of GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be given a genuine and realistic opportunity to engage in decisions of this scale. The circumstances imposed upon the affected communities have not met this standard, constraining their ability to respond meaningfully. It is therefore imperative that Scottish Ministers take these shortcomings into careful consideration when assessing the representations made, recognising that the process as it stands undermines the principles of fair and informed public involvement essential to sound decision-making.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish

Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.170 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and significant effects are accepted for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

However, the evaluation of heritage impacts appears to underestimate the significance of Iona's monastic landscape, which includes internationally important sites such as the Abbey, the Nunnery, and the high crosses. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape in understanding this heritage. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, potentially overlooking key experiential impacts.

Community concerns further underline the scale of the effects, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a landmark 141 metres high visible from Iona at approximately 33 kilometres; the largest turbines would exceed this height by approximately 194 metres at a closer distance of roughly two-thirds of that range. Taken together, these points suggest that the visual, community, and heritage impacts on Iona may be both more extensive and more significant than the applicant's assessment indicates.

The applicant's assessment fails to adequately address the practical consequences for the communities of Mull and Ross of Mull, particularly those whose livelihoods depend on tourism and the unspoiled coastal environment. Fionnphort, as the gateway to Iona and the primary embarkation point for visitors, is identified by the applicant as significantly affected, yet no tailored, place-specific mitigation or engagement appears to have been undertaken for this community directly bound to visitor flows. This omission risks undermining the economic and social fabric of a community reliant on tourism.

Moreover, while the applicant recognises significant effects on Core Paths and local landscape areas across Mull, including Central, South and West Mull, and the Loch na Keal National Scenic Area, these are attributed only Medium magnitude despite the acknowledged High sensitivity of these landscapes over distances ranging from 21 to 33 kilometres. The assessment's reliance on distance-based criteria, as exemplified by its treatment of the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, appears to underestimate the visual and experiential impacts on these highly valued and designated landscapes.

Finally, the importance of Mull's west-facing tourism economy and its associated wildlife boat operations, alongside the accommodation and support of western townships, is not adequately reflected in the assessment. These communities depend on the integrity of the Atlantic seascape, which the proposed development would industrialise, yet no place-based assessment or consideration of their specific economic and cultural reliance has been provided. This lack of detailed, localised analysis undermines confidence that the significant visual, economic, and community impacts on these coastal areas have been properly understood or addressed.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery. The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

The applicant's assessment that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of

Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the potential impacts on communities that are both visually and economically connected to the seascape in question.

The assessment reveals a systematic pattern whereby the applicant's methodology reduces the recognised significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach results in the moderation of the magnitude of change and a corresponding discounting of impacts at these distances. Such a consistent pattern undermines the credibility of the environmental impact assessment, as it fails to fully acknowledge the potential consequences experienced by affected communities.

Moreover, this methodological choice means that those communities residing beyond the 20-kilometre threshold have not been subject to any detailed, place-specific assessment. The absence of a focused evaluation for these areas risks overlooking important localised effects, thereby limiting the scope and depth of the environmental appraisal. Consequently, the assessment does not provide a comprehensive understanding of the broader environmental and social ramifications.

In conclusion, the applicant's distance-based approach leads to an underestimation of significant effects on highly sensitive receptors beyond 20 kilometres, which compromises the integrity of the entire environmental impact assessment. This systematic discounting should be reconsidered to ensure that all relevant receptors and communities receive appropriate and thorough evaluation.

1.1.171 Personal Observations

In addition to the planning matters above, I am personally concerned because: Sustainable, green energy sources must be developed locally in ethical, place-responsive ways. This project affects all of the local residents as they have not been properly consulted, nor will they benefit from most of the energy that will be generated by the project. The local community should have been consulted meaningfully before this proposal was developed in any way.

Based on my own local knowledge, I also wish to highlight that: greater consideration should be given to local solutions for sustainable energy for Iona.

Finally, I would also ask the Scottish Ministers to consider: that the unethical economic benefit of the underlying objective of the proposal is to develop profit for companies operating outwith Scotland and the UK as a whole. This, ultimately, does not benefit any Scots.

1.1.172 Summary

The proposal submitted by the applicant fails to satisfy the relevant statutory and policy requirements governing its determination. Their own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities of the coastal area in question. Furthermore, independent reviews of the applicant's documentation reveal that these impacts have been systematically underestimated. Crucially, the necessary heritage assessment has not been conducted. Although potential effects on the island communities within the project's scope were identified, no formal assessment of these impacts has been undertaken. Additionally, the project has not demonstrated compliance with required ecological criteria. It is also important to note that only a portion of the entire scheme has been submitted for the Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm proposal and the associated marine licence. Should the Ministers decide against refusal at this stage, I request that further environmental information be sought, accompanied by enhanced visualisations. I also recommend that the applications be subject to a public inquiry, thereby allowing full and thorough examination of all issues raised by this objection. Regardless of the ultimate decision, it is essential that the Scottish Ministers explicitly address and provide clear conclusions on the impacts on cultural heritage and the affected island communities within their reasoning.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 118
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, operating as ScottishPower Renewables. I request that this correspondence be registered as an objection and that I receive notification of the final determination regarding these proposals.

The development in question involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This scheme comprises between 91 and 144 turbines, each potentially reaching up to 335 metres to blade tip. The site is situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay. Notably, the location lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded in the planning and environmental considerations governed by the relevant statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide adequate evidence demonstrating that all pertinent legal and policy tests have been met. Objectors such as myself bear no obligation to prove otherwise. Upon careful review of the submissions and supporting material, it is clear that the applicant has failed to satisfy these requirements. Consequently, the applications should be refused consent.

1.1.173 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not show that the applicant has adequately addressed these requirements or taken reasonable steps to mitigate adverse effects on these protected interests. This omission is significant given the statutory obligation imposed both on the applicant and the Scottish Ministers in the determination process.

Furthermore, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory duties, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent. The application’s shortcomings in meeting these fundamental statutory requirements undermine its legitimacy and warrant refusal in accordance with the statutory mandate.

The marine licence application under consideration must be determined in strict accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set forth in Scotland’s National Marine Plan. The statutory framework mandates that authorisation decisions align with the National Marine Plan unless relevant considerations indicate otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28

(Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish the criteria against which the application must be evaluated.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence submitted fails to adequately address the requirements of GEN 4 concerning co-existence, which is critical to ensuring that the proposed development does not adversely affect existing marine activities and uses. Furthermore, the application does not satisfactorily engage with the historic environment policies GEN 6 and the related paragraphs 4.22 to 4.23, leaving significant uncertainty regarding potential impacts on heritage assets. Similarly, the provisions of GEN 7 and paragraph 4.28 relating to landscape and national scenic areas have not been met, as the application lacks sufficient assessment or mitigation measures to protect these designated landscapes.

The natural heritage considerations under GEN 9 are also inadequately addressed, with omissions in the evidence base that undermine confidence in the protection of marine biodiversity and habitats. The engagement requirements stipulated by GEN 18 have not been fulfilled, as the application does not demonstrate meaningful consultation or involvement of relevant stakeholders. Crucially, the application falls short of the standards set by GEN 19 and paragraph 4.81 concerning sound evidence; the data and assessments provided are incomplete or insufficiently robust to support a lawful and informed decision. Lastly, the cumulative impacts policy GEN 21 and paragraph 4.85 have not been properly considered, with the application neglecting to evaluate the combined effects of the proposal alongside existing and planned marine activities.

Given these substantive deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the statutory requirements for marine licence determination. As established by the Marine (Scotland) Act 2010 and the National Marine Plan, such failures weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds that it does not comply with the statutory policies and evidential standards necessary for lawful authorisation.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy) of NPF4. However, the evidence before the determining authority demonstrates that the proposal fails to comply with these key policies.

Firstly, with regard to Policy 3 (Biodiversity) and Policy 4 (Natural Places), the applicant has not demonstrated compliance. The evidence identifies deficiencies and omissions in the assessment and protection of biodiversity and natural places. These shortcomings mean that the proposal does not meet the statutory and policy requirements to safeguard and enhance biodiversity and natural environments as mandated by NPF4.

Secondly, concerning Policy 7 (Historic Assets and Places), the proposal similarly fails to demonstrate that it will preserve or enhance historic assets and places. The evidence reveals conflicts with the applicable legal and policy framework protecting heritage, with no adequate mitigation or justification provided to address the adverse impacts identified.

Thirdly, in relation to Policy 11 (Energy), the applicant has not shown that the proposal aligns with the energy policies set out in NPF4. The evidence highlights omissions and uncertainties in the energy assessment, indicating non-compliance with the policy's requirements.

Where compliance with these policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The proposal's failure to satisfy the requirements of Policies 3, 4, 7, and 11 of NPF4 constitutes a fundamental breach of the statutory and policy framework that must be afforded significant weight in the determination of this application. Consent should therefore be refused.

The application fails to comply with the statutory requirements under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. This fundamental procedural omission undermines the decision-making process and renders the application incomplete and unlawful.

Furthermore, the proposal does not satisfy the obligations imposed by the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment means that the potential impacts on protected habitats and species remain unknown and unmitigated, directly contravening the legal framework designed to safeguard these sites.

Given these clear deficiencies and failures to demonstrate compliance with both environmental impact assessment and habitats regulations, the application conflicts with the relevant legal and policy requirements. As established by the approved evidence, such unresolved matters must weigh decisively against the granting of consent for this proposal.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. There is no evidence within the application or supporting documentation that properly addresses or weighs these interests, resulting in a clear omission in the assessment. This failure to engage with the statutory duty under the Act represents a significant procedural and substantive deficiency.

Given that the evidence identifies this omission and a conflict with the applicable legal and policy framework, the proposal cannot be regarded as meeting the necessary statutory tests. As established by the Islands (Scotland) Act 2018 and confirmed in the approved evidence, where compliance has not been demonstrated, such deficiencies weigh decisively against the granting of consent. Therefore, the application should be refused on the basis that it does not properly consider or give due weight to the interests of island communities as required by law.

The applicant has failed to provide the robust, objective, and proportionate evidence necessary to demonstrate compliance with all relevant statutory duties, planning

policies, and environmental assessment requirements. This failure is critical because the responsibility to prove such compliance rests squarely with the applicant.

The evidence confirms that where compliance is not demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these shortcomings must weigh decisively against the granting of consent. In this case, the applicant has not met this evidential burden. There is no satisfactory demonstration that every relevant legal and policy obligation has been fulfilled, nor has the applicant addressed or resolved the identified deficiencies and omissions.

Consequently, the application does not satisfy the fundamental requirement to prove adherence to the statutory and policy framework governing the proposal. This failure alone justifies refusal, as the absence of adequate evidence undermines the lawful and policy-compliant determination of the application.

1.1.174 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the duration of its stated 35-year operational life. This change would be significant in that it disrupts the existing dark horizon, fundamentally transforming the visual environment experienced along the coast after dark.

Furthermore, this operational lifespan does not mitigate the policy implications of such harm. The decision to grant consent for this development effectively constitutes an acceptance that this seascape is appropriate for wind farm use, setting a precedent with enduring consequences for the character and perception of the area. This assessment underscores the need for careful consideration of the seascape's intrinsic qualities and the broader implications of introducing lighting in what is now an unilluminated maritime setting.

The applicant's submission fails to adequately demonstrate that proposed mitigation measures effectively address the identified effects on landscape and seascape interests. While certain impacts are acknowledged, the application does not provide sufficient evidence that these effects have been mitigated to a degree that would satisfy the requirements set out in the relevant policies. In particular, the assessment lacks clarity on how the scale of these effects aligns with the methodology employed, undermining confidence in the conclusions presented.

These shortcomings result in non-compliance with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the proposal does not meet the requirements of NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, as identified in the submitted evidence. Without clear demonstration of consistency and adherence to these policies, the proposal cannot be considered acceptable in its current form.

1.1.175 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty regarding the applicant's assessment methodology and the reliability of its conclusions about the impacts on heritage assets. Although the applicant states that it has adopted Historic Environment Scotland's recognised approach for

evaluating effects on the setting of historic assets, questions remain about whether this methodology has been correctly applied. This approach, developed through consultation with Historic Environment Scotland, requires a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset, with particular emphasis on assessing whether the integrity of setting is maintained. Importantly, the methodology makes clear that visual change alone should not be directly equated with adverse impact.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's own Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed in line with the accepted methodology. Instead, the assessment focuses on describing visual changes such as visibility, distance, prominence of monuments, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without showing the required evaluative step that distinguishes between visual change and impact, as mandated by the methodology. This key evaluative analysis is absent in all the examples examined by the Audit.

Given this lack of demonstrated compliance with the prescribed methodology, the assessment's conclusions about the impacts on the heritage setting are undermined and cannot be relied upon without further clarification and evidence. It is therefore essential that the methodology be fully and transparently applied, with the necessary evaluative steps clearly articulated, to ensure a robust and credible understanding of heritage impacts in this case.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In

light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

1.1.176 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, whose presence underpins the local economy and social fabric. These visitors are attracted specifically by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic foundations of these communities. This, in turn, would jeopardise the provision of essential services, threaten population stability and ultimately compromise the long-term viability of the island settlements.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

The proposal fails to meet the mitigation standards required to protect island communities, as it lacks the necessary assessment and evidence to demonstrate compliance with relevant policy and statutory duties. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal does not align with NPF4 Policy 11(c) nor the obligations under the Islands (Scotland) Act 2018, both of which insist on thorough evaluation and meaningful engagement with island communities throughout the planning process. The applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the comprehensive assessment needed to understand the proposal's effects on these communities. Consequently, it has not been demonstrated that the development is compatible with the sustainability of island communities, nor that the statutory duties owed to them have been properly discharged. This non-compliance undermines the proposal's acceptability in planning terms.

1.1.177 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant indicates an acknowledgment that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it cannot be ruled out that the integrity of a protected site might be compromised. This approach underscores the applicant's recognition that the Scottish Ministers might reach a different conclusion regarding potential adverse effects, thereby necessitating these precautionary measures. The inclusion of these documents is therefore a significant aspect of the application, reflecting the applicant's attempt to address and mitigate possible impacts under the relevant derogation provisions.

The practical consequence of the applicant's failure to satisfy the statutory tests is that the protection of internationally important habitats and species cannot be assured, which fundamentally undermines the justification for granting consent. Without clear demonstration that these legal requirements are met, the risk of harm to designated ecological features remains unacceptably high.

The evidence submitted, including the applicant's own derogation documents, reveals significant uncertainty regarding compliance with the necessary statutory criteria. This uncertainty indicates that the applicant has not provided sufficient assurance that the proposed development will avoid adverse impacts on protected habitats and species of international importance.

Given the applicant's inability to meet the statutory tests, it is clear that the application does not fulfil the legal obligations designed to safeguard critical ecological assets. Consequently, the case for granting consent is not made, and the application should be refused to ensure the continued protection of these internationally significant environmental features.

1.1.178 Cumulative and In-Combination Effects

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations regarding project splitting and the assessment of cumulative effects. Unlike a comprehensive assessment approach, which would integrate all elements of a project to fully appraise environmental impacts, the current proposal does not adequately consider the combined and in-combination effects of the development. This omission undermines the ability to evaluate the overall environmental consequences accurately and limits the effectiveness of any proposed mitigation measures.

Furthermore, the applicant has not explicitly addressed the implications of deferred works within the project scope, which is a critical factor in understanding the full extent of environmental impacts. The decision-making process requires clear and transparent consideration of these deferred elements to ensure compliance with relevant policies and regulations. Without this explicit treatment, there is a significant risk that the cumulative impacts remain underestimated, leading to an incomplete assessment that could result in adverse environmental consequences going unmitigated. It is therefore requested that the deferred works be expressly addressed and integrated within the determination to uphold policy compliance and environmental protection standards.

1.1.179 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has demonstrable deficiencies that undermine effective public participation and thus the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place significant weight on the site-selection exercise; however, the quality of public involvement at both the plan and site-selection stages has been inadequate and persists into the current application phase. The application itself consists of many thousands of pages of technical documentation, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case comprehensively.

National policy guidance, including GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, requires that affected parties be afforded a realistic opportunity to engage with decisions of this magnitude. The circumstances under which the affected communities have been required to respond fall short of this standard. It is therefore incumbent upon the Scottish Ministers to give careful consideration to these procedural shortcomings when assessing the representations submitted.

The Environmental Impact Assessment (EIA) submitted with this application constitutes the principal evidential basis for the Scottish Ministers' determination. However, the issue is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate them adequately or employs methodologies that do not substantiate the conclusions presented. For example, the landscape assessment's results reflect a distance-based pattern not supported by its own stated methodology; the heritage assessment does not evidence the application of its integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the environmental information provided.

Furthermore, the application relies on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding environmental matters. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Scottish Ministers are obliged to decide based on the evidence currently before them rather than assumptions that unresolved issues will be satisfactorily settled subsequently. The applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision, rendering the EIA insufficient for the purposes of this application.

1.1.180 Effects on Local Area

The applicant's distance-based methodology results in a systematic underestimation of significant effects on sensitive receptors situated beyond 20 kilometres from the proposed development. This approach leads to a practical consequence whereby the magnitude of change is consistently moderated and the resulting effects are discounted in the environmental impact assessment. Such treatment effectively diminishes the acknowledged impact on these receptors, despite their recognised sensitivity.

Critically, this moderation occurs without any corresponding place-based assessment for the communities living beyond the 20-kilometre threshold. These communities, which may experience genuine and substantial effects, are therefore excluded from thorough evaluation and consideration in the assessment process. This exclusion undermines the comprehensiveness and integrity of the environmental impact assessment as a whole.

Taken together, these factors demonstrate a clear and concerning pattern: wherever highly sensitive receptors exist beyond approximately 20 kilometres, the applicant's assessment systematically reduces the perceived significance of effects, while the affected communities receive no tailored or detailed appraisal. This practice not only diminishes the accuracy of the assessment but also fails to properly acknowledge and address the real impacts experienced by those communities.

1.1.181 Personal Observations

In addition to the planning matters above, I am personally concerned about the impact on the environment, wild life and lack of meaningful consultation with local inhabitants.

1.1.182 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, while the adverse effects on the island communities have been identified, no assessment of these impacts has been conducted. The ecological criteria required by law remain unproven as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the related marine licence. Should the Ministers be inclined to grant consent, it is requested that additional environmental information and enhanced visual representations be secured. Moreover, the application should be determined only following a public inquiry, allowing a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers provide clear, reasoned conclusions on the effects of the proposal on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 119
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, specifically application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the development of an offshore wind farm with an installed capacity of approximately 2 GW. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, sited within a designated Windfarm Development Area covering around 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, in proximity to the islands and coastal communities of the southern Hebrides.

I request that this correspondence be recorded as a formal objection, that my details be registered accordingly, and that I receive notification of the final determination concerning these applications.

The following considerations outline the planning and environmental grounds underpinning this objection, assessed within the relevant statutory and policy context governing these applications. It is essential to note that the onus lies wholly with the applicant to provide robust and sufficient evidence demonstrating compliance with the applicable statutory tests and policy requirements. Objectors are not obligated to substantiate the contrary position. Based on the analysis presented herein, it is clear that the applicant has failed to meet this evidential burden, and as such, the applications ought to be refused consent.

1.1.183 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

The visual materials submitted in support of the assessment inherently limit the ability to accurately convey the scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly acknowledges that printed visualisations cannot fully replicate the scale a viewer perceives in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent means of correcting or enhancing perceptual accuracy. Consequently, reliance on these visual materials may result in an underestimation of the true visual effects, and their limitations should be given due consideration when assessing the overall impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the anticipated 35-year operational period. This fundamental change to the nocturnal visual environment would be unprecedented in the area, marking a significant departure from the existing natural seascape conditions.

From a planning policy perspective, the 35-year operational lifespan does not mitigate the harm caused by this change. Consent for the development effectively signals that the seascape in question is deemed appropriate for wind farm use, with all attendant impacts on its night-time character. Therefore, the introduction of lighting must be carefully weighed against policy objectives protecting seascape quality, as the decision to permit this lighting is also a decision about the long-term character and suitability of the seascape for such development.

The proposal's acknowledged effects engage multiple key planning policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is no clear evidence that the proposal complies with policies designed to protect nationally important landscapes and seascapes. In light of this, it is evident that the proposal does not meet the necessary policy requirements safeguarding these valued environmental interests.

1.1.184 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment follows Historic Environment Scotland's established methodology for evaluating the effects of development on the setting of historic assets. This recognised approach, developed and refined in consultation with Historic Environment Scotland, mandates a specific evaluation of whether changes

to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is sufficiently preserved. Importantly, the methodology clarifies that visual change alone should not be automatically equated with an adverse impact, thereby requiring a nuanced assessment beyond mere visibility or prominence.

However, a Methodological Audit conducted in support of community objections, relying exclusively on the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the applicant's report acknowledges key heritage attributes and describes visual changes in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not demonstrate how the integrity of setting has been evaluated in accordance with the prescribed methodology. The essential evaluative step—judging whether the integrity of setting is adequately retained—is absent from the examples examined by the Audit. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is undermined, as the required methodological rigor has not been fully applied.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets is derived from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These qualities are primarily experienced dynamically, through movement, rather than from fixed viewpoints. However, the mitigation measures proposed appear to focus predominantly on visual impacts from selected static vantage points, which risks underrepresenting the broader experiential and cultural landscape values identified in the baseline.

This concern is reinforced by Historic Environment Scotland's consultation responses, as recorded within the application, which specifically requested additional viewpoints to ensure these wider cultural qualities are properly captured. The omission of such viewpoints in the applicant's assessment suggests an incomplete understanding of the heritage assets' significance and potentially inadequate mitigation of impacts on the overall cultural landscape. For a robust and comprehensive evaluation, it is essential that the assessment fully incorporates the living, dynamic nature of the heritage setting, beyond isolated visual perspectives.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions derived from it cannot be regarded as reliable. Where the landscape effects have been understated, as previously detailed, any conclusions about heritage impacts that rely on this assessment inevitably reflect the same understatement. This dependency undermines the credibility of the heritage evaluation and raises serious concerns about the robustness of the overall appraisal.

It is essential to recognise that the heritage conclusions are not independent but are intrinsically linked to the landscape assessment. As the evidence from source S01 makes clear, the heritage conclusions "depend upon the landscape assessment," meaning that any errors or omissions in the latter directly influence the former. Therefore, if the landscape assessment fails to accurately capture the extent or

significance of landscape effects, the heritage conclusions built upon it must be regarded as compromised.

In light of this interdependency, the planning process must take account of the potential underestimation of landscape effects and the consequent impact on heritage conclusions. Without a thorough and accurate landscape assessment, the heritage impact appraisal lacks a sound evidential basis, which could lead to inappropriate decision-making. It is thus imperative that the landscape assessment is revisited and rectified to ensure that heritage impacts are properly understood and addressed in the planning determination.

There remains significant uncertainty regarding the application's compliance with essential policy requirements for heritage protection. Specifically, the proposal engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets, together with their settings, will be adequately protected. Crucially, Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. This lack of robust evidence undermines confidence in the application's acceptability and weighs against its approval.

1.1.185 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, providing detailed consideration of potential port communities, but omitting any equivalent place-based examination of the island communities that would be directly impacted. Nonetheless, this assessment concludes that those island communities are of low sensitivity to tourism-related effects.

It is important to recognise that small island economies cannot be accurately represented by regional averages. These economies tend to be highly concentrated

in sectors that are particularly vulnerable to alterations in the qualities which attract visitors. Moreover, a dependence on increasing visitor numbers does not mitigate this sensitivity; rather, it amplifies the reliance on the very attributes that may be jeopardised by the development. Consequently, the conclusion that island communities exhibit low sensitivity, reached without a detailed place-specific analysis, cannot be regarded as evidence-based but must be seen as an unsubstantiated assumption.

Given the absence of a thorough and place-based socio-economic evaluation of the island communities, the applicant's methodology appears flawed and insufficient for understanding or mitigating potential impacts on these sensitive populations. A more nuanced and locally focused assessment is necessary to ensure that the unique characteristics and vulnerabilities of island economies are fully considered in the planning process.

The applicant's submission acknowledges that island communities warrant particular scrutiny in the planning process; however, it fails to provide the necessary assessment to understand the effects of the proposal on these communities. This omission is significant given the clear requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a statutory duty to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the conclusion of the decision-making process.

In this context, the applicant has not demonstrated that the proposal is compatible with the principles of sustainable island communities. The absence of a thorough assessment means that the statutory duties owed to these communities remain unfulfilled. Consequently, the proposal does not meet the required planning and statutory standards for protecting island communities, as it fails to properly consider or mitigate potential socio-economic impacts. This shortfall undermines the confidence that the development will support or enhance the long-term viability and well-being of island populations, contrary to the express policy and legal framework governing such matters.

1.1.186 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant's decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant's own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

Mitigation, compensation proposals, and future monitoring plans, while important components of development management, do not in themselves satisfy the stringent legal requirements for consent under the Habitats Regulations. The competent authority must be assured, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site. This high evidential standard ensures that any potential harm is thoroughly assessed and ruled out before consent can be granted.

The legal framework governing these assessments is clear and exacting. Consent may only be lawfully granted if the strict derogation tests are met, placing the burden of proof firmly on the applicant. This means that developers must provide compelling, conclusive evidence that their proposals will not compromise protected habitats or species. Mere reliance on proposed mitigation or compensation measures does not discharge this burden, as these measures alone cannot guarantee the absence of adverse effects.

This rigorous approach is reflected in the integration of the Habitats Regulations with national planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these set a clear policy context that underlines the necessity for precise, evidence-based assessments, ensuring that environmental protection remains paramount in decision-making processes.

The applicant's submission falls short in demonstrating that the statutory tests designed to protect internationally important habitats and species are satisfied, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the necessary legal criteria for permitting harm to protected ecological features can be met, thereby undermining the robustness of the mitigation measures proposed.

Given the high threshold set by the relevant statutory framework for safeguarding internationally significant ecological assets, the absence of demonstrable compliance with these tests weakens the justification for granting consent. Without clear and convincing evidence that all legal requirements have been fulfilled, the application cannot be considered compliant with the statutory protections afforded to these vital natural interests.

1.1.187 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is presently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to subsequent applications. These elements are essential for the operation of the wind farm, yet their effects are excluded from the current assessment. Consequently, the cumulative impacts of the entire project are never evaluated together. This fragmented approach directly contradicts the legal principle established in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than segmented into smaller parts whose individual effects may seem less significant. By postponing the consideration of vital components until after the principal decision, the current process undermines comprehensive evaluation and risks overlooking significant environmental and planning impacts.

The cumulative impact assessment presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment (EIA). As established, the underlying evaluations of landscape, heritage, and socio-economic effects have been shown to understate the true scale of impacts. Consequently, the baseline from which the cumulative effects are measured is inherently reduced, reflecting an incomplete or diminished understanding of the existing environmental and social context.

This flawed baseline directly compromises the reliability of the cumulative assessment. When the combined effects of the current proposal are considered alongside other existing, consented, and foreseeable developments, the aggregated impacts are likewise underestimated. Therefore, the cumulative assessment fails to provide a robust or accurate account of the true scale of combined effects, undermining its utility for informed decision-making and potentially leading to inadequate mitigation or planning responses.

The applicant's submission fails to demonstrate that the cumulative and in-combination effects of the proposal have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). This shortcoming undermines the ability to fully understand the quantified environmental impact of the project and any associated deferred works.

Moreover, the approach taken does not comply with the Environmental Impact Assessment Regulations concerning project splitting. By not addressing the project as a whole, including all deferred components, the assessment omits crucial considerations necessary for an informed decision. This omission compromises the integrity of the environmental evaluation and the planning process.

In light of these deficiencies, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure compliance with relevant policy and regulatory frameworks. Without this, approval would be premature and inconsistent with statutory requirements. Therefore, I respectfully request that the application be refused until such comprehensive assessment is satisfactorily provided.

1.1.188 Public Engagement, Site Selection and Environmental Information

The failure to ensure effective public participation has materially compromised the legitimacy of the site-selection process and subsequent application. The applicant requests that the Scottish Ministers place significant weight on the site-selection exercise; however, the deficiencies in public engagement throughout both the plan and site-selection stages have persisted into the current application phase. This application is supported by an extensive volume of technical documentation spanning many thousands of pages, yet the consultation window was scheduled during the busiest months for the island communities concerned. During this peak visitor season, residents are continuously engaged in work and specialist advice becomes scarce, severely limiting their capacity to engage meaningfully with the proposals. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must be afforded a realistic opportunity to participate in decisions of this scale. The conditions imposed on the local communities have fallen short of this threshold, undermining the fairness and transparency of the process. In light of these considerations, it is imperative that the Ministers give due weight to these deficiencies when evaluating the representations made. The inadequacy of the consultation process represents a fundamental procedural flaw that calls into question the robustness and legitimacy of the site-selection and application decisions.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy is questionable, as it identifies potential pathways to significant effects but fails to investigate them thoroughly. For example, the landscape assessment employs a methodology that does not align with the outcomes presented, notably applying a distance pattern not supported by its own framework. Similarly, the heritage assessment lacks demonstration of its own integrity test’s application, and the socio-economic assessment omits a place-based analysis of the islands affected. These methodological shortcomings undermine the reliability of the conclusions drawn.

Moreover, the reliance on future assessment, post-consent plans, monitoring, and additional approvals does not satisfy the requirements of the Environmental Impact Assessment Regulations, which stipulate that likely significant effects must be understood before determination. The Scottish Ministers are compelled to decide based on the evidence currently available, rather than on the expectation that unresolved issues will be addressed satisfactorily at a later stage. The applicant has

not demonstrated that the environmental information provided is adequate for informed decision-making, and as such, the application should not be approved in its present form.

1.1.189 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation principally approaches Islay as a potential project location rather than considering it as a distinct island community that will be directly affected. Notably, the Atlantic-facing communities of Islay are situated adjacent to the nearest edge of the 448 square kilometre development area, yet the application fails to provide a place-based assessment of how this proximity will impact the community's setting, economy, or daily life. This omission raises concerns about the thoroughness of the environmental and social impact analysis for Islay, given its unique exposure and relationship to the development site.

For Colonsay and Oronsay, the seaward outlook is integral to daily life, directly facing the proposed array. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation strategy, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be entirely ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community and is vulnerable to impacts on its open maritime setting. The shortcomings identified in the heritage assessment for other assets apply equally here, undermining confidence in the adequacy of the heritage impact evaluation. Taken together, these points demonstrate an underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall reliability of the environmental and heritage impact appraisal.

The applicant's Coastal Character assessment recognises that the Sound of Iona possesses a high sensitivity to the proposed development, noting its direct orientation towards the site and extensive visibility. The assessment identifies a large geographical extent of change, with effects considered moderate and significant across approximately 21 kilometres. The turbines would span around 39 degrees of the horizon, impacting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is deemed highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery and the high crosses, holds heritage significance of international importance. The applicant's baseline recognises that this significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, was not fully addressed, as no visualisation was provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission raises concerns about the completeness of the visual impact assessment on such a culturally sensitive and historically important landscape.

Community response on Iona further underlines the potential for significant adverse effects. A household consultation revealed that 92 per cent of respondents object to the proposal. Moreover, the applicant's own consultants identified habitability as a potential pathway of effect on the community, yet this was never formally assessed. To illustrate the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—at 141 metres and visible from Iona at around 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors suggest that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment recognises significant effects on various parts of Mull and the Ross of Mull coastal communities, notably acknowledging high sensitivity in the Ross of Mull South coastal area at distances of approximately 22 to 24 kilometres with a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross. Importantly, Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—is identified as experiencing significant effects, reflecting its direct connection to visitor flows. Similarly, significant impacts are noted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as on the Loch na Keal National Scenic Area, which is of high sensitivity throughout a range of 21 to 33 kilometres, though the magnitude attributed does not exceed medium.

However, the applicant's methodology relies heavily on distance as a determinant of impact, as illustrated by the assessment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, exemplifying the distance-based reasoning that this objection challenges. This approach risks underestimating the true significance of visual and experiential effects on sensitive landscapes and communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

Moreover, the assessment does not adequately address the economic and community implications for Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers reliant on the integrity of the Atlantic seascape. This seascape faces potential industrialisation from the proposed development, yet none of these coastal communities has been subject to a detailed, place-based evaluation. Without such focused consideration, the full extent of adverse effects on tourism-dependent economies and community cohesion remains insufficiently understood.

While the applicant's assessment acknowledges some effects on designated landscapes, its conclusions underestimate significant impacts on key seaboard National Scenic Areas and vulnerable island communities, failing to provide adequate mitigation. Notably, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting—qualities directly threatened by the development—yet the applicant has made no specific assessment of effects on Ulva's natural or cultural environment. Similarly,

Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the development site, lies beyond the 30-kilometre assessment boundary recommended by NatureScot. Despite the applicant's own recognition of Staffa's panoramic maritime qualities, it concludes that the scale of change there would be small and not significant, a position that fails to fully account for the island's celebrated status and sensitivity. The Jura National Scenic Area, assessed as having High sensitivity between 28 and 32 kilometres distance, is attributed only Medium to Low magnitude of impact, with this moderation justified by distance and retained landforms. However, this approach neglects that the designation rests on Jura's wild, undeveloped Atlantic outlook, which is inherently vulnerable to change. A similar treatment is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, where effects are also minimized. Taken together, these assessments omit or understate significant effects on the natural and cultural qualities of important designated landscapes and island communities, thereby undermining the level of protection necessary for their regeneration and conservation.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area, this conclusion fails to reflect the true scale of impact on a landscape of High sensitivity at approximately 35 kilometres distance. Tiree's exceptionally low-lying topography, with its highest point, Ben Hynish, reaching only 141 metres, defines a landscape dominated by the vast expanse of sea and sky. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in this open oceanic horizon. Such significant alteration to the island's distinctive and sensitive seascape cannot reasonably be characterised as Low magnitude. This understatement leads to an unreliable evaluation of effects, overlooking the profound visual and experiential change that the proposal would impose on Tiree's unique landscape character.

The applicant's assessment fails to address the significant effects on key mainland and island communities that have direct visual and economic ties to the seascape in question. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the development site from the east. The impact on this delicate community and its economy, which relies heavily on its maritime setting, has been entirely overlooked. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the types of receptors that the applicant's distance-based mitigation approach purports to moderate, yet the assessment does not adequately consider their value or sensitivity.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character and visitor economies are fundamentally shaped by the open Atlantic seaboard vistas towards Islay, Jura and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts that overlook the development area share this visual and economic reliance. By neglecting to assess the potential effects on these interconnected communities and landscapes, the applicant's evaluation lacks comprehensiveness and fails to provide a robust basis for decision-making. This omission calls into question the reliability of the

conclusions drawn and highlights a need for a more thorough and inclusive assessment.

The applicant's environmental impact assessment systematically moderates and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a diminished recognition of the magnitude of change experienced by such receptors and fails to provide any place-based assessment for the communities affected at these distances. Consequently, the methodology employed undermines the integrity of the assessment by neglecting significant impacts on these distant but sensitive populations. It is therefore concluded that the applicant's distance-based approach does not adequately capture or address the full extent of environmental effects, warranting careful reconsideration.

1.1.190 Personal Observations

In addition to the planning matters above, I am personally concerned because I have been visiting the Hebrides regularly and frequently for around 40 years and know and love the area, its history and culture, its nature and wildlife, its contrasts in scenery and habitat and its sense of peace and tranquility. I also hugely respect and value its people, their communities, industries, and all that encompasses island life. I also know how much they rely on tourism and as far as I am concerned if this development goes ahead it will certainly affect my choice of where I travel, and I know I am not alone on this.
For many years I have actively campaigned for action on climate change and fully recognise the need for renewable energy. However this cannot be imposed on land and seascapes, on important and fragile eco-systems and on communities without regard for the huge damage that this would cause in so many areas,
(which I have included in my objections). Such a level of destruction, once perpetrated, is irreversible could not be justified by any commercial considerations.

1.1.191 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, a closer scrutiny of the submitted documents reveals that these significant effects have been underestimated. Crucially, the necessary heritage assessment has not been undertaken, and although impacts on the island communities have been identified, they remain unassessed. Furthermore, it has not been demonstrated that the ecological safeguards mandated by law can be complied with. Compounding these concerns, only a portion of the entire project is subject to the Ministers' consideration at this stage.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers decline consent for the MachairWind Offshore Wind Farm proposal and refuse the related marine licence application.

Should the Ministers consider not to refuse outright, it is requested that they require the submission of additional environmental information alongside enhanced visual representations of the development. Furthermore, it is proposed that the applications be determined only following a public inquiry, thereby allowing all objections and issues raised to be fully and properly examined. Regardless of the final decision, it is also sought that the Ministers clearly articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 120
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) concerning the MachairWind Offshore Wind Farm, which is the subject of application numbers 00012385 and 00012386. Application 00012385 requests consent under section 36 of the Electricity Act 1989, while application 00012386 seeks a marine licence in accordance with Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be treated officially as an objection, that I be recorded as an objector, and that I receive notification of the decisions reached on these applications.

The proposed development involves establishing an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would comprise between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to the blade tip. The site encompasses a Windfarm Development Area of around 448 square kilometres, situated north-west of the Isle of Islay and west of Colonsay. Its location is roughly 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the planning and environmental grounds supporting my objection. These considerations are framed within the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to provide adequate evidence demonstrating that all relevant statutory tests and policy requirements have been met. Those opposing the development are not obliged to establish contrary proof. In this instance, the applicant has failed to meet this evidential burden, and for the reasons detailed below, consent ought to be refused.

1.1.192 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. This omission undermines the reliability of the predicted effects on sensitive receptors. An independent Evidence Note, drawing exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. The applicant’s own documentation further acknowledges the influence of distance in its judgements, noting for example that a coastal area more than 30 kilometres away is assessed as experiencing only a small scale of change due to viewing distance. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes leads to the application of protective tests based on understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects that the Scottish Ministers are being

asked to consent to. The absence of a clear and consistent distance threshold in the assessment methodology, coupled with the implicit scaling down of impacts over distances critical to sensitive landscapes, calls into question the robustness and accuracy of the applicant's environmental effect predictions. Such methodological shortcomings must be addressed to ensure that decision-making rests on a sound and transparent evidence base.

The applicant's submission incorporates visualisation materials prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent technical and perceptual constraints. This guidance emphasises that printed visualisations are unable to fully replicate the scale and depth that a viewer experiences in situ. Consequently, while the visual evidence serves as an important tool in assessing potential impacts, it cannot be regarded as an exact or complete representation of the real-world visual experience.

Furthermore, the wireline drawings included alongside the photographic panoramas share these limitations. As technical renderings embedded within the visualisations, they do not act as independent corrections or enhancements to the photographic content. Instead, they reflect the same spatial and perceptual restrictions inherent in the source imagery, which must be borne in mind when interpreting their accuracy and reliability.

Given these acknowledged limitations, it is necessary to approach the visualisation materials with a measured understanding of their role and scope. They provide a useful, albeit imperfect, basis for assessing visual effects but should not be the sole or definitive means of judgement. Additional considerations and contextual information remain essential to forming a comprehensive evaluation.

The proposal's acknowledged effects engage multiple key planning policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is no clear evidence that the proposal complies with policies designed to protect nationally important landscapes and seascapes. In light of this, it is evident that the proposal does not meet the necessary policy requirements safeguarding these valued environmental interests.

1.1.193 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This methodology, developed and refined through consultation with Historic Environment Scotland, mandates an evaluation not only of visual change but specifically whether such changes affect the contribution that setting makes to the cultural significance of the heritage asset, as well as whether the integrity of the setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be equated directly with adverse impact, requiring a nuanced and comprehensive assessment beyond mere visibility or proximity considerations.

However, a Methodological Audit prepared in support of community objections, drawing solely on the applicant's Appendix 14.3, identifies a critical deficiency in the applicant's operational assessment. While the assessment acknowledges relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment effectively describes visual changes but omits the essential evaluative step required by the methodology—namely, a clear analysis of how those visual changes translate into effects on cultural significance and setting integrity. This omission undermines the reliability of the applicant's conclusions that the integrity of the setting is adequately retained, thereby calling into question the overall robustness of the heritage impact assessment.

1.1.194 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a significant underestimation of the potential impacts on island communities directly facing the proposed development. Despite identifying habitability as a key pathway through which the proposal could affect these communities, no specific assessment of their habitability was undertaken. Instead, the assessment focuses on regional port communities, concluding that island communities exhibit low sensitivity to tourism effects without any place-based analysis to support this claim.

This approach fails to recognise the unique economic structures of small island communities, which differ markedly from regional averages. Island economies are heavily concentrated in sectors that are most vulnerable to changes in the environmental and social qualities attracting visitors. Rather than mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these qualities, thereby heightening the risk of socio-economic harm. Consequently, the conclusion of low sensitivity is not founded on evidence but rests on an unsubstantiated assumption.

In light of these shortcomings, the socio-economic assessment does not provide a reliable basis for understanding or mitigating impacts on island communities. Without a thorough, place-specific evaluation of habitability and economic sensitivity, the applicant's methodology is inadequate. This undermines confidence in the planning

process and necessitates a more robust and locally informed assessment to ensure that the interests and vulnerabilities of island communities are properly addressed.

There remains significant uncertainty as to whether the proposal complies with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan mandate that decisions be based on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process. However, the applicant has acknowledged the need for particular scrutiny of island communities yet failed to conduct the necessary assessment to understand the potential impacts on them. Consequently, there is no demonstrated compatibility with the principles of sustainable island communities, and the statutory duties owed to these communities have not been satisfactorily discharged. In light of these shortcomings, the proposal does not meet the required planning and statutory standards, and therefore cannot be supported.

1.1.195 Ecology, Biodiversity and Habitats Regulations

The proposed development area encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and importance. Additionally, the surrounding marine environment supports a range of protected species, including seabirds, marine mammals, and basking sharks. Given the presence of these features and species, any construction, operational, and decommissioning activities must be carefully considered to avoid significant adverse environmental effects. However, the scale and duration of the proposed activities—spanning decades—present a substantial risk of disturbance and habitat degradation that cannot be readily mitigated to an acceptable level.

While mitigation measures may reduce certain impacts, the introduction of large-scale development activity into such a sensitive ecological context is inherently problematic. The Priority Marine Features and Annex I habitats within the development footprint are of high conservation value, and the surrounding waters serve as critical habitat for protected species. The cumulative effects of prolonged construction and operational disturbance could lead to lasting damage, undermining the ecological integrity of the site and adjacent marine environment. Therefore, the potential environmental consequences weigh heavily against the proposal's acceptability in its current form.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant's decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant's own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

This strict framework is set out in the Habitats Regulations and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). These collectively establish a high threshold for consent, ensuring that developments must meet rigorous environmental safeguards before approval can be lawfully granted. Consequently, planning decisions must be informed by robust scientific evidence to uphold these protections effectively.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.196 Cumulative and In-Combination Effects

The evidence demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and the

onshore transmission works deferred to future applications. As these elements are essential for the wind farm's operation, their exclusion from the present assessment results in the whole project's effects never being considered collectively. This fragmented approach means that significant impacts will be evaluated in subsequent consenting processes, following the principal decision, rather than in a comprehensive manner at the outset.

Such a methodology is procedurally and legally unsound, as it conflicts with the established principle upheld by the courts in Raeshaw Farms. This principle mandates that a project must be assessed in its entirety and not subdivided into smaller parts that individually appear less significant. By salami-slicing the project, the current assessment fails to provide a complete understanding of its overall environmental and planning implications, undermining the integrity of the decision-making process. Consequently, the current approach should be reconsidered to ensure a holistic evaluation of the entire project.

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This stems directly from the reliance on baseline assessments within the Environmental Impact Assessment that have themselves understated landscape, heritage, and socio-economic effects. As a result, the starting point for the cumulative assessment is flawed, leading to an overall diminished understanding of the proposal's broader implications.

Analytically, because the cumulative assessment depends entirely on these baseline conclusions, any inaccuracies or omissions in the initial evaluations inevitably carry through into the combined effects appraisal. Consequently, the assessment fails to capture the full scale and severity of cumulative impacts, reducing its reliability as a tool for informed decision-making. Without addressing these foundational understatements, the cumulative assessment cannot be regarded as a robust or comprehensive reflection of the development's true potential consequences.

Failure to adequately address the cumulative and in-combination effects of the proposed development risks undermining the integrity of the environmental impact assessment and the soundness of the planning decision. Without a clear demonstration that all elements of the project, including deferred works, have been fully considered, there is a practical danger that significant environmental impacts may be overlooked or underestimated. This omission compromises compliance with critical planning policies and regulatory requirements designed to prevent project splitting.

Specifically, the proposal does not satisfy the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e). These policies, together with the Environmental Impact Assessment Regulations, require a comprehensive assessment of the project as a whole, including any associated or subsequent works that may influence cumulative effects. The applicant's failure to explicitly address deferred works in the submission leaves a gap in the assessment process that must be rectified before determination.

Accordingly, it is essential that the decision-making process explicitly considers the treatment of the deferred works and ensures that the cumulative environmental effects are reliably identified and assessed. Only with such clarity and completeness can the proposal be properly evaluated against the relevant planning policies and statutory requirements. This approach is necessary to uphold the statutory framework and protect environmental interests effectively.

1.1.197 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has demonstrable deficiencies that undermine effective public participation and thus the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place significant weight on the site-selection exercise; however, the quality of public involvement at both the plan and site-selection stages has been inadequate and persists into the current application phase. The application itself consists of many thousands of pages of technical documentation, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case comprehensively.

National policy guidance, including GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, requires that affected parties be afforded a realistic opportunity to engage with decisions of this magnitude. The circumstances under which the affected communities have been required to respond fall short of this standard. It is therefore incumbent upon the Scottish Ministers to give careful consideration to these procedural shortcomings when assessing the representations submitted.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.198 Effects on Local Area

The development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, placing the Atlantic-facing communities of these islands in closest proximity to the proposed project. Despite this, the applicant's assessment primarily addresses Islay as a potential project location rather than evaluating it as an affected island community, neglecting any place-based analysis of impacts on its setting, economy, or community life. This omission undermines the reliability of the environmental and heritage impact evaluation in respect of Islay's distinct local context.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Of particular significance is the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline and is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged but unexcluded risk of harm to internationally protected seabird populations. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community, yet the heritage assessment fails to adequately consider its open maritime setting. These gaps collectively demonstrate that the applicant's evaluation underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

The applicant's assessment of the visual and community impacts on Iona significantly underestimates the scale and importance of these effects, particularly when mitigation measures are considered. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity with direct orientation towards the development area and extensive visibility. It notes a large geographical extent of change, moderate and significant overall effects extending approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. While the applicant acknowledges significant effects for residents and visitors across much of Iona, including at Dùn Ì, the island's highest point, the assessment fails to fully capture the scale of visual intrusion. For context, the largest turbines would exceed the height of Ben Hynish on Tiree—141 metres high and visible from Iona at about 33 kilometres—by approximately 194 metres, despite being located closer at roughly two-thirds of that distance. This comparison emphasises the turbines' imposing presence and challenges the adequacy of the applicant's mitigation claims.

Beyond visual impacts, the heritage and community implications are equally significant and insufficiently addressed. Iona's internationally important monastic landscape, including the Abbey, Nunnery and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated locations like Càrn Cùl ri Èirinn above St Columba's Bay, remains unmet, leaving a critical gap in the visual impact appraisal. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, underscoring strong local opposition. Despite the applicant's recognition of habitability as a potential pathway of effect on the community, no formal assessment of this impact was undertaken. Taken together, these factors indicate that the applicant's evaluation inadequately reflects the profound visual, heritage and social consequences for Iona, thereby

compromising the accuracy and robustness of the environmental and social impact appraisal.

When considering the applicant's assessment in relation to the effects on Mull and the Ross of Mull coastal communities and landscapes, it is important first to compare the proposed mitigation measures against the scale and nature of the impacts identified. The assessment acknowledges significant effects at key locations such as Erraid and along the Core Paths of the Ross of Mull South coastal area, which is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors, is accepted by the applicant as experiencing significant effects. This community is intrinsically connected to the visitor flows, underscoring the potential for substantial socio-economic consequences.

Extending across Mull, the applicant also accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is consistently assessed as having High sensitivity at viewing distances ranging from approximately 21 to 33 kilometres. However, the applicant attributes no more than a Medium magnitude to the impacts here, which may understate the true significance given the area's national scenic importance.

The approach taken towards the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Despite the acknowledged viewing distance of over 30 kilometres, the applicant judges the scale of change to be small, relying primarily on distance-based reasoning. This method, as outlined in the applicant's own terms, risks overlooking the qualitative aspects of visual and experiential impact that extend beyond mere separation distance.

Crucially, the west-facing tourism economy of Mull, including its wildlife boat operations and the accommodation sectors in its western townships, is deeply dependent on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet none of these communities has been afforded a detailed, place-based assessment within the applicant's documentation. This omission limits the understanding of the potential adverse effects on communities whose livelihoods are closely tied to the natural environment and visitor experience.

In conclusion, while the applicant recognises some significant effects, the reliance on distance as a primary determinant and the attribution of only Medium magnitude in areas of acknowledged High sensitivity suggest that the assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull. The lack of detailed, place-specific evaluation for key tourism-dependent communities further compounds this shortfall. Therefore, the assessment as presented inadequately addresses the significant effects on these sensitive coastal landscapes and their associated communities.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation

underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant's assessment concludes that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, exhibits a High sensitivity yet is attributed only a Low magnitude of change. This evaluation leads to a practical consequence whereby the impact upon Tiree's landscape character is materially underestimated, compromising the reliability of the overall effects assessment. The designation of Low magnitude fails to reflect the scale and prominence of the development as perceived from this sensitive receptor.

Tiree is an exceptionally low-lying island characterised by an open oceanic horizon and a landscape defined primarily by the dominance of sea and sky. Its highest elevation, Ben Hynish, rises to merely 141 metres, which emphasises the island's distinctive flat and expansive character. The introduction of turbines reaching up to 335 metres in height would constitute vertical elements of unprecedented scale within this seascape. Such structures would significantly alter the visual and experiential qualities that define Tiree's landscape, yet the assessment's Low magnitude rating does not adequately acknowledge this fundamental alteration.

In light of these considerations, the applicant's evaluation significantly understates the magnitude of change and its impact on Tiree's sensitive and distinctive landscape character. This understatement results in an unreliable appraisal of effects that fails to properly inform decision-making regarding the acceptability of the development's landscape and visual impacts. Accordingly, the assessment should be revisited to ensure a more accurate and proportionate recognition of the effects upon Tiree's unique seascape.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate visual and economic effects on surrounding communities. However, this approach does not adequately address the unique circumstances of certain mainland and island locations with direct views of the development. For instance,

Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters directly to the east, yet the applicant has failed to examine the potential impacts on its delicate social and economic fabric.

Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation claims are applied, yet the assessment does not sufficiently consider how the development might alter this important visual amenity and its associated visitor economy.

Furthermore, the chain of communities along the west coast of Kintyre, whose identity and tourism rely heavily on the open Atlantic seaboard views towards Islay, Jura, and beyond, are equally disregarded. The Treshnish Isles and other small islands with similar outlooks also share this vulnerability. In sum, the applicant's assessment lacks a comprehensive evaluation of these sensitive receptors, thereby undermining confidence in its conclusions and the effectiveness of proposed mitigation measures.

The applicant's environmental impact assessment systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres, a practice that contrasts with more precise, place-based mitigation approaches applied within closer proximities. This distance-based methodology effectively reduces the perceived magnitude of change and downplays the significance of impacts on distant communities. Consequently, the assessment fails to apply tailored mitigation measures that reflect the actual sensitivity and lived experience of those receptors, undermining the robustness of the proposed environmental protections.

Critically, the evidence demonstrates that wherever a highly sensitive receptor exists beyond this 20-kilometre threshold, the magnitude of change is consistently moderated and the effect discounted, yet no place-based assessment is provided for these communities. This omission means that those living with potentially significant effects have not had their specific circumstances properly evaluated, resulting in an incomplete and potentially misleading appraisal of environmental consequences. Such systematic discounting beyond 20 kilometres therefore compromises the integrity and comprehensiveness of the environmental impact assessment as a whole.

1.1.199 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, a detailed review of the applicant's submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted. Moreover, although the effects on the island communities involved were identified, these impacts have never undergone proper evaluation. The ecological assessments, which are essential to meet statutory tests, have not been demonstrated to be capable of compliance. It is also important to note that only a

portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow the substantive issues raised in this objection to be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address and state their conclusions on the effects of the proposal on cultural heritage and the island communities within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 121
Dear Sir/Madam,

I hereby submit my formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), pertain to a large-scale offshore wind development.

The project envisages the installation of an offshore wind farm with a capacity of approximately 2 gigawatts. This would involve between 91 and 144 turbines, each reaching a maximum height of 335 metres to blade tip. The proposed site extends over a Windfarm Development Area spanning roughly 448 square kilometres of marine space located north-west of Islay and to the west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to several islands and coastal communities within the southern Hebrides.

My objection is grounded in planning and environmental considerations relevant to the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus of proof lies entirely with the applicant, who must demonstrate with sufficient and robust evidence that all relevant statutory and policy tests are satisfied. Objectors, by contrast, bear no obligation to prove the contrary. Upon careful examination, it is clear that the applicant has failed to discharge this burden. Consequently, I assert that consent for the proposed development ought to be refused.

1.1.200 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, including sections 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal fails to meet these criteria. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining their integrity. Furthermore, the evidence does not demonstrate adequate protection for the cultural significance of scheduled monuments and their settings. The safeguarding of island communities has likewise not been assured, and the ecological requirements outlined by the policy have not been satisfactorily evidenced as capable of being met. Consequently, the proposal conflicts with the impact criteria set out in NPF4 Policy 11 and cannot be supported on this basis.

The proposal fails to demonstrate that mitigation measures would adequately address the significant adverse effects identified, thereby conflicting with several key policies within NPF4 that protect designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from substantial harm to their defining qualities. Additionally, Policies 7 and 3 require the protection of scheduled monuments and their settings, alongside biodiversity interests. The evidence clearly indicates that the proposal would cause significant adverse effects on nationally designated

landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has also not been demonstrated, and the ecological criteria outlined in Policy 3 remain unmet based on the evidence submitted. In light of these considerations, the proposal does not comply with the relevant NPF4 policies aimed at conserving nationally important natural, historic, and ecological assets.

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, as it would have adverse effects on the landscape, heritage, and community interests that these policies seek to protect. This incompatibility arises because the development would undermine the very attributes that the local plan is designed to safeguard. Consequently, the proposal does not accord with the development plan framework, nor does it align with the National Planning Framework 4 when considered in its entirety. Furthermore, the applicant has failed to demonstrate any justification or mitigation that would resolve this conflict. Therefore, the proposal is inconsistent with the relevant land-based policies and should not be supported.

1.1.201 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks clarity and consistency regarding the distance thresholds beyond which major effects are deemed to cease. Notably, the written methodology provided in Appendix 16.1 fails to specify any such threshold. However, an independent Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This indicates an implicit, yet unacknowledged, reliance on distance as a controlling factor in determining the scale of impact.

Further examination of the applicant's documents confirms the influence of distance in shaping these assessments. For example, an evaluation of a coastal area located over 30 kilometres from the development site concludes that the scale of change is small, explicitly citing the viewing distance as the rationale. Moreover, the Landscape Character synthesis categorises the magnitude of impact as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at the distances where the most sensitive designated landscapes are situated suggests that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not reliably reflect the true effects that the Scottish Ministers are being asked to consider and consent to.

When considering the visual impact of the proposed development, it is important to compare the extent to which mitigation measures can address potential adverse effects. While landscaping and screening can reduce visibility from certain viewpoints, the effectiveness of such measures is inherently limited by the nature of the terrain and the scale of the development. This highlights the need for a careful

and nuanced assessment of visual impacts, rather than reliance on visualisation materials alone.

The visual evidence presented in support of the application follows NatureScot's visualisation guidance, which the applicant adopts. This guidance acknowledges a fundamental limitation: printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Consequently, the images and wireline drawings—although useful—are constrained by the same photographic basis and do not independently correct the viewer's perception. The wireline drawings, presented within the panoramic projections, serve as a technical overlay rather than a definitive representation of the development's visual presence.

Given these technical and perceptual limitations, it is essential that decision-makers exercise caution when interpreting the visualisation materials. They should consider the potential discrepancies between the images and the actual experience on site, particularly in relation to the scale and prominence of the development. Such an approach ensures a balanced assessment that recognises the value of the visualisations while acknowledging their inherent constraints.

When considering the potential impacts of the proposed development on the night-time seascape character, it is important to weigh the nature and permanence of the changes introduced by the aviation and navigation lighting. Unlike other forms of mitigation that may seek to reduce visual intrusion through landscaping or design adjustments, lighting effects in this context represent a novel and enduring alteration to a currently unlit sea horizon. This distinct characteristic means that traditional mitigation measures offer limited scope in addressing the fundamental change to the seascape's night-time appearance.

The development would introduce permanent lighting for the entire stated 35-year operational life, marking a substantial departure from the existing natural darkness of the seascape. This continuous illumination would alter the character of the night-time environment in a way that is both visible and appreciable to those experiencing the seascape, effectively creating a new visual element that did not previously exist. The significance of this impact must be carefully balanced against the benefits of the development, recognising that the presence of such lighting is integral to the scheme's operation and safety requirements.

Moreover, the duration of the development's operational life does not mitigate the policy implications of this change. A decision to consent to the development inherently signifies a judgment that this particular seascape is appropriate for wind farm use, including the acceptance of the associated lighting effects. Thus, the harm to the night-time seascape character is not simply a temporary inconvenience but a defining factor in the long-term suitability of the site. This consideration must be central to the planning decision, ensuring that the balance between development objectives and seascape preservation is properly maintained.

The applicant's evidence acknowledges that the proposal's effects engage several key policies designed to safeguard landscape and seascape interests. Specifically, these effects relate to National Planning Framework 4 (NPF4) Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine

Plan. This recognition indicates that the proposal falls within the scope of established policy measures intended to protect nationally important landscapes and seascapes from adverse impacts arising from development activities.

However, despite this acknowledgement, the applicant has not demonstrated that its conclusions regarding the scale of the accepted effects are consistent with its own stated methodology. Moreover, there is a failure to show compliance with the policies explicitly aimed at protecting these nationally significant landscape and seascape assets. This lack of methodological consistency and evidential substantiation calls into question the adequacy of the applicant's assessment and undermines confidence in the proposal's conformity with the relevant planning frameworks. Consequently, the proposal does not meet the requirements of the key policies that seek to safeguard landscape and seascape interests, thereby warranting careful reconsideration.

1.1.202 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland's established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Without this critical evaluation, the assessment's conclusions about heritage impacts lack the necessary evidential foundation.

In comparing the applicant's proposed mitigation measures with the established baseline cultural significance of the heritage assets, it becomes evident that the broader experiential qualities may not be fully addressed. The baseline assessment, as recorded by the applicant, acknowledges that the cultural importance of the affected assets arises not only from their physical presence but from dynamic elements such as pilgrimage routes, arrival by sea, and movement through an active cultural landscape. This includes the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are primarily experienced in motion rather than from static viewpoints. Historic Environment Scotland's consultation responses, as documented within the application, further emphasise this point by requesting additional viewpoints to capture these wider experiential qualities more comprehensively. Taken together, this suggests that the applicant's assessment and subsequent mitigation strategies may inadequately represent the full scope of cultural significance, particularly the intangible, movement-based aspects of heritage experience. Therefore, it is essential that any further assessment or mitigation planning explicitly incorporates these dynamic

qualities to ensure a more holistic understanding and protection of the cultural landscape.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

The application fails to demonstrate compliance with NPF4 Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) regarding their setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided the necessary assessment to show that the cultural significance of internationally and nationally important heritage assets and their settings would be safeguarded. Consequently, the Scottish Ministers lack the evidence required to conclude that these heritage assets would be protected. On this basis, the proposal does not meet key policy requirements for heritage protection and should therefore be refused.

1.1.203 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they cannot fully compensate for the fundamental harm posed by the proposal to the qualities that attract visitors to the island communities in question. The applicant’s own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity and remoteness as the primary reasons visitors are drawn to these areas. These qualities form the essential foundation upon which the local economies depend, and any alteration or degradation of these attributes would have profound consequences.

The exceptional reliance of these island communities on visitor-generated income means that changes undermining their appeal strike directly at their economic base. This, in turn, jeopardises the provision of local services, threatens population retention, and undermines the overall social and economic sustainability of these communities. It is therefore clear that the proposal, by impacting the very qualities that attract visitors, poses a serious risk to the continuing viability of the islands. Such fundamental effects cannot be adequately mitigated and must be given significant weight in the planning decision.

The applicant's own consultants acknowledge habitability as a potentially significant pathway through which the proposal could impact island communities, yet no assessment of the habitability of these affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 operates at a regional scale, focusing in detail on potential port communities while failing to provide an equivalent place-based analysis of the island communities directly facing the development. Despite this absence, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies are not accurately represented by regional averages. Their economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Moreover, reliance on increasing visitor numbers amplifies rather than mitigates this sensitivity, deepening economic dependence on the very attributes at risk. Therefore, the conclusion of low sensitivity, reached without any place-based analysis, lacks evidential basis and amounts to an unfounded assumption.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.204 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, which are acknowledged as ecologically significant within the site itself. Additionally, the surrounding waters provide a habitat for various protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its adjacent marine environment as areas of high ecological sensitivity and importance.

The proposed development would involve construction, operational, and decommissioning activities carried out on a very large scale over several decades. Given the presence of these sensitive habitats and protected species, such extensive and prolonged disturbance poses a substantial risk of significant adverse environmental effects. Careful consideration of these ecological factors is essential in the planning process to ensure the protection and conservation of the marine environment within and around the development site.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where the possibility of an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application is therefore a noteworthy aspect, as it indicates the applicant's acknowledgment of potential impacts. Moreover, the applicant's own position implies that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. In light of this, the submission of these derogation and compensation documents reflects a recognition of the need to address and mitigate possible harm to protected species and sites under the relevant statutory provisions.

The legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The applicant's submissions fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. Despite the inclusion of derogation documents intended to support the case, these materials reveal an insufficient degree of certainty that the necessary legal safeguards can be met. This absence of clarity undermines the fundamental requirements imposed by relevant environmental legislation, which demand rigorous proof that adverse effects on protected ecological features will be avoided or adequately mitigated.

Given this evidential shortfall, the application cannot be regarded as satisfying the statutory criteria for consent. The failure to establish that the prescribed tests have been met calls into question the legitimacy of any grant of permission. In light of the above, the case for allowing the proposed development is significantly weakened,

and refusal is warranted to ensure the protection of internationally important ecological assets.

1.1.205 Cumulative and In-Combination Effects

There is significant uncertainty surrounding the current assessment approach for the proposed development, arising from the fact that only a portion of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—without which the wind farm cannot function—have been deferred to subsequent applications. This fragmentation means that the full range of impacts associated with the entire project are never evaluated concurrently, leaving a considerable gap in the understanding of its cumulative effects.

This piecemeal consideration is fundamentally at odds with established legal principles governing environmental assessment. The courts, as reaffirmed in the Raeshaw Farms case, have made clear that a project must be assessed in its entirety rather than being artificially segmented into smaller parts whose individual impacts appear less significant. By deferring key components of the development, the current process effectively circumvents comprehensive scrutiny, undermining the integrity of the decision-making framework.

In light of these concerns, it is essential that the assessment be reconsidered to ensure that all integral elements of the project are examined collectively. Only through such an approach can the Scottish Ministers properly evaluate the full environmental and planning implications, thereby upholding both legal requirements and sound planning practice.

The practical consequence of relying on the current cumulative impact assessment is that it fails to accurately reflect the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the cumulative assessment is fundamentally dependent on the baseline conditions established in the preceding Environmental Impact Assessment. When the initial assessments of landscape, heritage, and socio-economic factors understate the effects—as has been demonstrated—the cumulative assessment consequently adopts these diminished baselines, leading to an overall understatement of the aggregate impacts.

This issue is critical because an inaccurate baseline distorts the starting point from which cumulative effects are measured, thereby undermining the reliability of the entire assessment. The combined impacts should consider the full extent of existing and future developments to inform sound decision-making. However, by beginning from a reduced baseline, the assessment does not adequately capture the scale and significance of potential adverse effects. It follows that the cumulative impact assessment, as presented, is unreliable and should be revisited to ensure that baseline conditions are accurately represented, thereby providing a more truthful account of the combined effects on the environment and local communities.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as

well as NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations concerning project splitting. This omission raises significant concerns regarding the adequacy of the environmental assessment and the potential for unaccounted adverse impacts arising from the proposal.

Furthermore, the absence of explicit consideration of the deferred works within the application undermines the ability to fully understand the project as a whole. The decision-making process must expressly address these deferred elements to ensure compliance with the stated policies and regulations. Without such clarity, there is a risk that the cumulative effects will be underestimated, potentially leading to environmental harm that could have been mitigated through comprehensive evaluation.

In light of these points, it is imperative that the determination of this application includes a thorough assessment of the deferred works and a reliable identification of all cumulative and in-combination effects. Only with this information can the planning authority fulfil its statutory duties and ensure that the development proceeds in a manner consistent with relevant policy and regulatory requirements.

1.1.206 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is a significant undermining of the legitimacy of the site-selection process. The applicant urges the Scottish Ministers to place substantial weight on this process; however, the inadequate opportunities for meaningful engagement at both the plan and site-selection stages have persisted into the current application phase. The application itself encompasses thousands of pages of complex technical documentation, yet the consultation period coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is particularly limited. This imbalance is stark, especially considering the applicant has had years of preparation supported by considerable professional and financial resources.

The National Marine Plan’s guidance, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by such decisions must have a genuine and realistic opportunity to engage. The conditions imposed on the island communities in this instance fall short of that established standard. This shortfall in meaningful engagement compromises the fairness and inclusiveness that underpin sound decision-making processes in matters of this scale and significance.

In light of these considerations, it is imperative that the Scottish Ministers give due weight to the inadequacies of the consultation process when evaluating the representations presented. Failure to adequately address these deficiencies would not only diminish public confidence in the planning system but also risk decisions being made without the full and fair input of those most directly affected. Therefore, the consultation process as it stands cannot be regarded as meeting the required standards of effective public participation.

The Environmental Impact Assessment (EIA) submitted with the application serves as the principal evidential basis for determination; however, it falls short of sufficiency despite its extent. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively or relies on methodologies that undermine the robustness of its conclusions. For example, the landscape assessment derives outcomes based on a distance pattern that its own methodology does not support; the heritage assessment lacks demonstration of the application of its stated integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. Furthermore, the application depends in certain areas on future assessments, post-consent plans, ongoing monitoring, and additional approvals. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Consequently, the Scottish Ministers are compelled to decide based solely on the evidence before them, without presuming that unresolved matters will be adequately addressed subsequently. The applicant has therefore not demonstrated that the environmental information provided is sufficient to enable an informed decision.

1.1.207 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment inadequately addresses the direct and significant effects on Islay's Atlantic-facing communities, which confront the nearest edge of the development area. Rather than evaluating Islay as an affected island community in its own right, the application primarily considers it only in terms of its potential role as a direct project location, thereby neglecting any place-based analysis of impacts on local setting, economy, or community life.

Similarly, the assessment underestimates the effects on Colonsay and Oronsay, where the seaward outlook integral to daily life faces the array directly. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community's area, suffers from the same gaps identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Together, these omissions undermine the reliability of the environmental and heritage impact evaluation submitted.

While the applicant's assessment acknowledges certain impacts on Iona, a detailed analysis reveals that these effects are both more significant and more extensive than portrayed, thereby undermining the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with a direct orientation towards the development site and extensive visibility. The geographical extent of change is described as large, encompassing a distance of approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. This scale of visual intrusion is substantial, especially when considered alongside the West Coast of Iona, which is similarly

assessed as highly sensitive with widespread visibility. The applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì.

The heritage value of Iona's monastic landscape further compounds these concerns. The Abbey, the Nunnery, and the high crosses are recognised as heritage assets of international importance, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—specifically from the ferry crossing itself—no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that limits the understanding of the visual impact on key heritage experiences.

Community sentiment also underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed, leaving a critical aspect of social impact unexamined.

To contextualise the perceived scale of the turbines, a comparison with a familiar local landmark is instructive. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by about 194 metres while being situated at roughly two-thirds of the distance. This stark comparison highlights the overwhelming physical presence the turbines would have on the island's landscape.

In summary, the visual, community, and heritage impacts on Iona have been significantly underestimated in the applicant's assessment. The scale and significance of these effects warrant a more thorough and accurate evaluation to ensure that all potential consequences are fully understood and appropriately addressed.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, attributing a High sensitivity at distances of approximately 22 to 24 kilometres and a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition that Fionnphort—the gateway to Iona and the embarkation point for visitors—is the community most directly affected by changes to visitor flows. Across Mull, the applicant similarly accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet it is attributed no more than Medium magnitude of impact.

This assessment, however, demonstrates an overreliance on distance-based reasoning that inadequately captures the significance of effects on key coastal areas. For example, the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the scale of change is judged small due to a viewing distance exceeding 30 kilometres, exemplifies this limited approach. Such a methodology fails

to account for the qualitative importance of these landscapes to local communities and tourism.

Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, is fundamentally dependent on the Atlantic seascape that the proposed development would industrialise. Despite this, no place-based assessment has been provided for these communities. Consequently, the applicant's evaluation underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull's coastal landscapes and the tourism-dependent populations that rely upon them.

While the applicant's assessment acknowledges some potential effects on designated landscapes and island communities, it notably underestimates or omits significant impacts that warrant closer scrutiny. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island currently undergoing regeneration. The recovery of this small, re-establishing community relies heavily on the intact qualities of its setting and unspoilt seascape—precisely those elements potentially compromised by the development. Yet, no assessment has been undertaken to evaluate these effects on Ulva's natural and cultural environment. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies around 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite this, the applicant concludes that the scale of change at Staffa would be small and not significant, notwithstanding the panoramic maritime qualities that their own assessment recognises. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only a medium to low magnitude of effect, justified by factors such as distance, apparent scale, and retained landforms. However, this conclusion appears to underplay the importance of the designation's foundation on the wild, undeveloped character of its Atlantic outlook. A similar approach is applied to the Scarba, Lunga and Garvellachs National Scenic Area, situated about 35 to 40 kilometres from the development, where comparable assumptions are made. Taken together, these considerations suggest that the applicant's assessment may not fully capture the extent of effects on these valued landscapes and island communities. Consequently, the protection of their natural and cultural qualities remains inadequately assured.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and landscape impact on the island of Tiree. By attributing a Low magnitude of change to the South Tiree coastal area, despite its designation as of High sensitivity at approximately 35 kilometres distance, the evaluation fails to adequately reflect the scale of alteration that would result from the proposed development. This misjudgement risks misleading decision-makers and the public as to the true extent of effects on this sensitive environment.

Tiree's landscape character is exceptionally distinctive, defined predominantly by the expansive sea and sky that surround it. As a low-lying island with its highest elevation at Ben Hynish of only 141 metres, its open oceanic horizon is a fundamental element of its sense of place. The introduction of turbines reaching

heights of up to 335 metres would create vertical structures far exceeding any existing features, thereby fundamentally altering the seascape. The applicant's conclusion of Low magnitude change is therefore incongruous with the island's openness and sensitivity, representing a serious understatement of the visual intrusion and consequent impact.

In light of the above, the assessment's reliability is compromised by this understated evaluation of effects on Tiree's sensitive and distinctive landscape character. A more accurate and robust appraisal is necessary to ensure that the scale and significance of change are properly recognised, thereby informing an appropriate planning decision that respects the island's unique environmental qualities.

The applicant's assessment fails to consider significant effects on mainland and island communities that maintain direct visual and economic connections with the seascape of the proposed development. This omission undermines the comprehensiveness of the environmental evaluation and risks overlooking impacts that could materially affect local livelihoods and community cohesion.

Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its potential vulnerability to changes in seascape character. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based visual impact moderation is applied, yet the significance of these views for tourism and local identity has not been adequately addressed.

Furthermore, the chain of communities along the west coast of Kintyre depends on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which define their character and support their visitor economies. The Treshnish Isles, other small islands, and mainland coasts sharing views of the development area are similarly positioned. By excluding these receptors from thorough assessment, the applicant neglects the full scope of potential seascape effects, thereby compromising the robustness of the environmental appraisal. It is essential that these communities be fully considered to ensure a balanced and informed decision-making process.

The applicant's environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.208 Personal Observations

In addition to the planning matters above, I am personally concerned because: Such a plan to build and establish aforementioned energy sources when said energy is already in abundance is clearly either a hint at more profit-making for them to turn them off or at the making of data centers wich will affect the wildlife and local human community tenfold.

Based on my own local knowledge, I also wish to highlight that: With the building of such turbines the wild life will be altered in the way we have seen before. Barren land, fences and visual pollution to name some of them

Finally, I would also ask the Scottish Ministers to consider: Data centers will not be able to restore the permanent damage that will take place after the completion of such plan neither will the turbines that are to take place before them.

1.1.209 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluations acknowledge considerable impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastline. Independent examination of the applicant’s documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on island communities were identified, no corresponding evaluation has been undertaken. Furthermore, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider it inappropriate to refuse outright, I request that they mandate the submission of additional environmental information and enhanced visualisations. Moreover, I advocate that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 122
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited (ScottishPower Renewables). Please record this correspondence as an official objection, register me accordingly, and ensure I receive notification of the final determinations on these applications.

The proposed development entails an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The site is located within a Windfarm Development Area encompassing around 448 square kilometres of marine environment situated north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal settlements of the southern Hebrides.

The grounds for objection are rooted in planning and environmental considerations, assessed against the statutory and policy frameworks governing these applications. It is important to emphasise that the responsibility to satisfy all relevant legal and policy tests lies solely with the applicant. The onus is on MachairWind Limited to provide compelling evidence demonstrating compliance with the applicable criteria. Objectors are not obliged to establish any contrary case. On the basis of the following analysis, the applicant has failed to meet this evidential standard, and therefore, the applications should be refused consent.

1.1.210 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s submission with respect to these requirements. Where such compliance has not been demonstrated, or where conflicts with the applicable legal and policy framework exist, these matters weigh decisively against the granting of consent.

The marine licence application fails to comply with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be made in accordance with the National Marine Plan unless relevant considerations indicate otherwise. This application does not demonstrate compliance with key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National

Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The absence of demonstrated compliance and the presence of deficiencies and omissions in the evidence directly conflict with the applicable legal and policy framework. As such, these failures weigh decisively against the granting of consent for the marine licence.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the evidence submitted does not adequately demonstrate how this proposal will achieve such outcomes. Similarly, under Policy 4, the proposal must safeguard natural places, but the application lacks sufficient detail or measures to ensure the protection of these environments. Policy 7 mandates the conservation and enhancement of historic assets and places; however, the proposal fails to provide convincing evidence that these heritage considerations have been properly addressed or that any adverse impacts will be avoided or mitigated. Finally, Policy 11 on Energy requires that developments contribute positively to energy objectives, but the application does not satisfactorily show compliance with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of demonstrated conformity with these critical NPF4 policies, the proposal should be refused planning permission.

The proposal fails to provide the necessary Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of any proposal be identified, assessed, and reported prior to determination. This essential process has not been adequately fulfilled in the current submission.

Furthermore, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the relevant statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. There are clear deficiencies and omissions in the assessments provided, which conflict with the applicable legal and policy framework.

Given these failures to meet the mandatory procedural and substantive standards for environmental and habitats assessment, the proposal does not satisfy the statutory tests necessary for lawful consent. Consequently, these shortcomings must weigh decisively against the granting of planning permission.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met, as the submitted evidence does not show that the proposal has adequately addressed or incorporated the specific needs and concerns of the affected island communities.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' interests are a material consideration. In this case, the application documentation lacks any substantive assessment or meaningful engagement that would satisfy this legal requirement. There is no evidence that the proposal has identified, evaluated, or balanced the potential impacts on island communities, nor that it has taken steps to mitigate any adverse effects.

Furthermore, where compliance with the Act has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are evident, these shortcomings must weigh against the granting of consent. The absence of any demonstrable consideration of island communities' interests constitutes a clear procedural and substantive failure. This failure undermines the integrity of the decision-making process and conflicts directly with the statutory duties imposed by the Islands (Scotland) Act 2018.

Accordingly, the proposal should be refused on the grounds that it does not comply with the statutory requirement to consider and give due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The identified deficiencies and omissions are material and decisive factors that weigh strongly against the granting of planning consent.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to meet this burden. Compliance has not been demonstrated, and the evidence presented identifies deficiencies, omissions and conflicts with the applicable legal and policy framework. Such shortcomings weigh decisively against the granting of consent, as the absence of clear and comprehensive proof of compliance undermines the statutory and policy safeguards designed to regulate development proposals. Therefore, the application should be refused on the basis that the applicant has not fulfilled the necessary evidential requirements.

1.1.211 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 endorses such development only when specific impacts are appropriately addressed, including those on communities under Policy 11(c), and on landscape, seascape, and other receptors under Policies 11(d) and

11(e). In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be protected, nor that island communities would be adequately safeguarded. Additionally, the ecological tests required by the policy have not been shown to be capable of being met based on the submitted evidence. Consequently, the proposal conflicts with the comprehensive impact considerations essential to Policy 11's framework.

The proposal must be assessed against a range of National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7, including section 7(h) concerning scheduled monuments, and sections 7(c) and 7(d) relating to the settings of historic assets, impose stringent protections. Policy 3 further requires that biodiversity considerations are integral to decision-making.

Upon detailed examination, the proposal conflicts with these policies in several respects. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their special qualities for which they are recognised. The application has failed to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns about the integrity of these heritage assets. Moreover, the proposal does not sufficiently ensure the safeguarding of island communities, which are a protected element under the relevant policies. Finally, the ecological assessments submitted do not convincingly meet the necessary tests to confirm that biodiversity impacts would be adequately managed or mitigated.

In conclusion, the evidence indicates that the proposal does not comply with multiple relevant NPF4 policies intended to protect designated assets, thereby raising substantial policy conflicts that weigh against its approval.

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These elements are fundamental to the local environment and identity, and their protection is a clear objective of the relevant policies. The proposal's impacts run contrary to these aims, resulting in tangible harm to the area's character and valued assets.

This conflict with the development plan framework is significant and cannot be overlooked. The proposal fails to align with the policies set out in the Argyll and Bute Local Development Plan 2 that are material to land-based effects, underscoring an inconsistency with the established planning framework. Furthermore, this discord extends to the National Planning Framework 4 when considered in its entirety, which the applicant has not successfully rebutted or mitigated through their submissions.

In conclusion, the proposal's adverse effects and policy conflicts demonstrate that it is not supported by the terrestrial development plan framework. Given the clear and substantive nature of these inconsistencies, the proposal should be regarded as

contrary to the planning policies designed to protect the landscape, heritage, and community interests of Argyll and Bute. It follows that the proposal should be refused on these grounds.

1.1.212 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the duration of its stated 35-year operational life. This introduction of artificial lighting represents a significant change to the existing visual environment, impacting the natural qualities and experience of the seascape after dark.

Moreover, the operational lifespan of the development does not limit the degree of harm in policy terms. Granting consent for this proposal effectively constitutes a determination that this seascape is suitable for wind farm use, setting a precedent for future developments and potentially diminishing the protection afforded to the night-time seascape character by existing planning policies. This underlines the importance of carefully considering the implications of lighting effects on seascape character within the planning decision-making process.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.213 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland’s recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant’s Appendix 14.3 and submitted in support of community objections, identifies

significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant's own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment's conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a range of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. However, Historic Environment Scotland, as recorded in the application's consultation responses, has identified that the assessment may not fully capture these broader experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its intangible values are properly represented. This suggests that the applicant's current assessment may inadequately reflect the holistic and lived experience of the heritage assets, which is critical to understanding their full cultural significance.

The landscape assessment forms the foundation upon which the heritage impact conclusions are drawn. When the landscape effects are understated, as has been demonstrated, any heritage conclusions that rely on that assessment inevitably adopt the same understatement. This interdependence calls into question the robustness of the heritage conclusions presented.

Given the reliance of heritage assessments on the landscape evaluation, it is essential that the landscape effects are accurately and comprehensively appraised. Failure to do so undermines the credibility of the heritage conclusions and suggests that the overall impact may be more significant than acknowledged. Consequently, the heritage impact conclusions should be re-examined in light of a more thorough and transparent landscape assessment.

The application falls short in providing adequate mitigation measures to safeguard the cultural significance of internationally and nationally important heritage assets, as required by relevant planning policies. Specifically, it fails to comply with the stringent provisions of NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the protection of their settings. Additionally, it does not meet the requirements set out in GEN 6 and the detailed guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. Without a robust and demonstrable mitigation strategy, the proposed development cannot be considered to adequately protect these heritage assets or their surroundings.

Furthermore, the applicant has not supplied Scottish Ministers with the necessary assessment to confirm that the cultural significance of these heritage assets and their settings will indeed be preserved. This omission means that the decision-makers lack critical information required to evaluate the impact of the proposal on heritage values fully. Consequently, the application fails to satisfy the essential policy test for heritage protection, undermining its acceptability within the planning framework. In light of these shortcomings, the proposal should not be supported.

1.1.214 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social well-being. The visitor numbers are drawn by intrinsic qualities identified in the applicant's own baseline studies, notably the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. These attributes are not incidental but form the fundamental attractions upon which the local economy depends.

Any alteration to these defining characteristics would therefore have a direct and profound impact on the economic foundations of these island communities. This, in turn, would threaten the viability of essential services, the retention of local populations, and ultimately the long-term sustainability of these communities. The proposal, by risking degradation of these visitor-attracting qualities, jeopardises the continued economic and social viability of the islands themselves.

The proposal fails to comply with the relevant planning policies and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, the proposal does not meet the standards established by NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and given appropriate weight through meaningful engagement throughout the decision-making process, from inception to conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, the necessary assessments to understand the potential impacts on these communities have not been undertaken. As a result, there is no demonstrated compatibility between the proposal and the sustainability of island communities. Crucially, the statutory duties owed to these communities have not been fulfilled. In light of this, the proposal does not meet the required planning and statutory standards for assessing and protecting island communities, and permission should therefore be refused.

1.1.215 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various

protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation efforts, aiming to address potential adverse effects on a protected site. Their presence in the application suggests that the applicant acknowledges the possibility of significant impacts and has sought to propose measures intended to offset them.

However, it is important to note that such derogation and compensation documents are typically prepared for circumstances where an adverse effect on site integrity cannot be ruled out. The mere submission of these plans reflects a recognition that the applicant's assessment does not definitively exclude harm to the protected population. This introduces a degree of uncertainty regarding the effectiveness of the proposed mitigation measures and whether they will fully prevent negative consequences.

Furthermore, the applicant's approach implies that the final determination on potential adverse effects rests with the Scottish Ministers, who may arrive at a different conclusion. Consequently, while the submitted documents demonstrate a willingness to engage with the derogation process, this does not guarantee that the proposals will satisfy the necessary statutory tests or that the protected site's integrity will be maintained. It remains essential that these considerations are given due weight in the planning decision.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.216 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it considers only part of the project, namely the wind farm itself, while deferring key components such as the export cable corridor and the onshore transmission works to subsequent applications. As these elements are essential for the operation of the wind farm, their exclusion means that the full effects of the project are never evaluated together. This segmented approach contradicts established legal principles, as confirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety

rather than divided into smaller parts whose individual impacts appear less significant. By fragmenting the consenting process in this way, important aspects of the project's environmental and planning implications are deferred until after the principal decision has been made, thereby undermining the integrity and completeness of the overall assessment.

The cumulative impact assessment fails to provide a reliable evaluation of the combined effects because it relies on flawed baseline assessments, resulting in an understated starting point. Specifically, the environmental impact assessment's underlying landscape, heritage, and socio-economic evaluations have already diminished the extent of identified effects. Consequently, the cumulative assessment inherits this reduced baseline, leading to an underestimation of the total impact when considering this proposal alongside other existing, consented, and foreseeable developments. This fundamental flaw undermines the credibility of the cumulative effects conclusions and calls into question the sufficiency of the mitigation measures proposed.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.217 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist

advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The Environmental Impact Assessment submitted with this application fails to provide sufficiently robust evidence to enable the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across various topics, it does not investigate these impacts comprehensively. For instance, the landscape assessment draws conclusions based on a distance pattern that is not supported by its own stated methodology. Similarly, the heritage assessment lacks demonstration of the application of its prescribed integrity test, and the socio-economic assessment omits a detailed, place-based analysis of the affected islands. These shortcomings collectively undermine the reliability of the environmental information presented.

Furthermore, the application frequently defers critical aspects of its assessment to future stages, including post-consent plans, ongoing monitoring, and additional approvals. However, such reliance does not satisfy the requirements set out in the Environmental Impact Assessment Regulations, which mandate that likely significant effects must be fully understood prior to determination. The practice of postponing essential evaluations to a later date is inconsistent with the statutory framework intended to ensure comprehensive environmental consideration at the decision-making stage.

In conclusion, the Scottish Ministers are obliged to base their determination on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed in the future. Given the deficiencies identified, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards. It is therefore inappropriate to grant consent on the basis of the existing assessment, and the application should not be approved in its present form.

1.1.218 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant’s assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie in closest proximity to the proposed development—which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay—the application primarily addresses Islay in terms of its potential as a direct project location. This approach neglects a thorough, place-based evaluation of the impacts on Islay as a distinct island community, particularly its Atlantic-facing settlements that confront the nearest

edge of the development zone, leaving potential effects on their setting, local economy, and community life insufficiently explored.

The situation is no less concerning for Colonsay and Oronsay, where the seaward outlook is integral to daily life and faces directly towards the development array. Notably, the North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and forms the focus of the applicant's derogation case and compensation proposals. This area hosts an internationally protected seabird population, and the application itself acknowledges that harm to this resource cannot be excluded, highlighting a degree of unresolved risk and impact. Such an admission underscores the need for a more comprehensive and transparent assessment of the environmental consequences.

Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, also demands closer scrutiny. The identified gaps in the heritage assessment apply equally to the evaluation of its open maritime setting, which forms a critical part of its historic significance. Taken together, these considerations demonstrate that the current environmental and heritage impact evaluation does not convincingly address all relevant effects on these islands, thereby undermining the reliability of the overall assessment and warranting further detailed and place-specific analysis.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison

underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The applicant's assessment fails to adequately address the substantial visual, economic, and community impacts that the proposed development would have on the coastal communities and designated landscapes of Mull and the Ross of Mull. Practically, this omission risks undermining the viability of key tourism-dependent areas and the experience of visitors who contribute significantly to the local economy. For example, the Ross of Mull South coastal area, located approximately 22 to 24 kilometres from the development site, is recognised as having High sensitivity and is attributed a Medium magnitude of effect. The applicant acknowledges significant impacts at Erraid and on the Core Paths of the Ross, and also concedes that Fionnphort—the gateway to Iona and principal embarkation point for visitors—is likely to experience significant effects. This community is directly reliant on the flow of visitors, and the identified impact would therefore have tangible consequences for its social and economic wellbeing.

Across Mull more broadly, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas. Notably, the Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and lies approximately 21 to 33 kilometres from the proposed site, is classified as being of High sensitivity. Yet, it is attributed no greater than a Medium magnitude of effect, a characterization that appears to understate the potential scale of impact on this nationally recognised landscape. Furthermore, the applicant's approach to the Wilderness and Gribun Rocks coastal area exemplifies a reliance on distance-based reasoning, stating that because the viewing distance exceeds 30 kilometres, the scale of change is "small." This assessment method risks overlooking the importance of certain viewpoints and the cumulative effects on landscape character and community perception.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and the accommodation sector in its western townships—depends heavily on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet no place-based assessment has been undertaken for these communities. This lack of focused evaluation means that the full scope of economic and social consequences remains insufficiently understood and inadequately mitigated within the applicant's documentation.

In conclusion, the applicant's assessment does not provide a comprehensive or appropriately weighted analysis of the significant visual, economic, and community effects on Mull and the Ross of Mull's coastal landscapes and settlements. This deficiency undermines confidence in the conclusions drawn and fails to safeguard the interests of tourism-reliant communities and nationally designated landscapes that would be materially affected by the proposal.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share this position. The absence of targeted assessment for these locations undermines confidence in the applicant's conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

There remains considerable uncertainty regarding the applicant's approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect's significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant's methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.219 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: The importance for elected politicians to stand up and say NO to any developments which undermines the way of life, the wishes, and the well-being of those communities directly affected by these developments. The importance of being seen to be autonomous by making decisions that pursue the best outcomes for the country for energy policy as a whole.

1.1.220 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, independent reviews of the applicant's documentation reveal that these impacts have been understated. Furthermore, a comprehensive heritage assessment, as mandated, has not been undertaken. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been conducted. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. Compounding these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the related marine licence. Should the Ministers be disinclined to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Moreover, the decision-making process should be deferred until after a public inquiry, thereby allowing thorough scrutiny of the concerns raised in this objection. Irrespective of the final determination, it is further requested that the Scottish Ministers articulate explicit conclusions within their reasons, particularly addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 123
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, operating as ScottishPower Renewables. I request that this correspondence be registered as an objection and that I receive notification of the final determination regarding these proposals.

The development in question involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This scheme comprises between 91 and 144 turbines, each potentially reaching up to 335 metres to blade tip. The site is situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay. Notably, the location lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded in the planning and environmental considerations governed by the relevant statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide adequate evidence demonstrating that all pertinent legal and policy tests have been met. Objectors such as myself bear no obligation to prove otherwise. Upon careful review of the submissions and supporting material, it is clear that the applicant has failed to satisfy these requirements. Consequently, the applications should be refused consent.

1.1.221 Legislative and Policy Framework

The applicant’s submission in this case must be considered in the context of Schedule 9 to the Electricity Act 1989, which explicitly requires that the applicant have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is mandated to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, as the determining authority, are similarly required to have regard to these statutory duties in their decision-making process. This statutory framework establishes a clear and non-negotiable obligation on both the applicant and the decision-maker to ensure that the environmental and heritage values potentially affected by the proposal are fully considered and protected.

In the present application, there is a failure to demonstrate compliance with these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s approach to addressing the preservation of natural beauty and the conservation of flora, fauna, and features of special interest. There is also a lack of adequate consideration or protection measures for sites, buildings, and objects of architectural, historic, or archaeological interest. The absence of demonstrated reasonable steps to mitigate adverse effects further compounds these

shortcomings. Given that the statutory duties under Schedule 9 have not been met, and that the evidence reveals conflicts with the applicable legal and policy framework, these matters must weigh decisively against the granting of consent for the proposal.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and Scotland's National Marine Plan, as explicitly required by the statutory framework. The National Marine Plan's General Policies, notably GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts), are integral to the assessment and must be complied with for the application to be lawfully authorised.

The evidence before the determining authority does not demonstrate compliance with these statutory policies. There are clear deficiencies and omissions in the application's submission that fail to satisfy the requirements of the National Marine Plan. In particular, the application does not adequately address the need for co-existence with existing marine users as required by GEN 4, nor does it provide sufficient assessment or mitigation measures concerning impacts on the historic environment as mandated by GEN 6 and associated paragraphs. The application similarly falls short in its consideration of landscape and national scenic areas under GEN 7, and it lacks the necessary robust evaluation of natural heritage impacts demanded by GEN 9.

Furthermore, the application does not meet the standards of engagement and consultation set out in GEN 18, nor does it provide sound evidence in accordance with GEN 19 and paragraph 4.81. The absence of comprehensive cumulative impact assessment as required by GEN 21 and paragraph 4.85 further undermines the application's compliance with the National Marine Plan.

Given these material failures to demonstrate compliance with the applicable legal and policy framework, the application is fundamentally deficient. As established by the statutory regime and confirmed in the evidence, where compliance has not been demonstrated or where deficiencies and conflicts with the legal and policy framework exist, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the statutory requirements of the Marine (Scotland) Act 2010 nor the policies of Scotland's National Marine Plan.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. Policy 3 mandates the protection and enhancement of biodiversity, yet the application does not provide sufficient evidence that biodiversity impacts have been adequately assessed or mitigated. Similarly, Policy 4 requires the safeguarding of natural places, but the proposal omits necessary measures to prevent harm to these environments. Policy 7 demands careful consideration of historic assets and places, yet the submission lacks comprehensive evaluation or mitigation strategies to address potential adverse effects on heritage assets. Furthermore, Policy 11 on

energy necessitates adherence to sustainable energy principles, which the proposal fails to substantiate. The absence of robust mitigation strategies and the failure to demonstrate compliance with these policies indicate significant shortcomings in the application's approach to environmental and heritage protection.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The evidence clearly identifies deficiencies, omissions, and conflicts between the proposal and the applicable legal and policy framework. Where compliance has not been demonstrated, these matters weigh decisively against the granting of consent. Given the proposal's failure to meet the explicit requirements of Policies 3, 4, 7, and 11, it is evident that the application does not accord with the National Planning Framework 4. Consequently, the proposal should be refused on the basis that it conflicts with essential national planning policies designed to protect biodiversity, natural places, historic assets, and energy sustainability.

The proposal fails to meet the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The submitted documentation does not provide a comprehensive environmental impact assessment that satisfies these legal obligations. This omission is critical, as it prevents the determining authority from making an informed decision based on a full understanding of the potential environmental consequences. Without such an assessment, the proposal is procedurally defective and non-compliant with the established regulatory framework governing environmental impact assessments.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a proper Habitats Regulations Assessment means that the potential impacts on protected habitats and species have not been adequately considered or mitigated. This failure constitutes a significant legal and policy deficiency. Given that compliance with these regulations has not been demonstrated, and that the evidence reveals clear omissions and conflicts with the relevant legal and policy framework, these matters must weigh decisively against the granting of consent for the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a significant procedural deficiency. This statutory requirement obliges decision-makers to explicitly address and give due weight to the unique circumstances and needs of island communities during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal obligations set out in the Act.

Furthermore, the evidence identifies clear omissions and deficiencies in the proposal's assessment regarding island communities, which conflict with the applicable legal and policy framework. Where such failures occur, established guidance confirms that these matters must weigh against the granting of consent. In

this case, the lack of adequate consideration of island community interests constitutes a material failure that should result in refusal of the application.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental deficiency in the application, as the evidential burden to prove such compliance rests squarely with the applicant. The absence of such demonstration means that the application does not meet the necessary legal and policy standards.

Furthermore, the evidence submitted reveals omissions and conflicts with the applicable legal and policy framework. These unresolved matters are not minor procedural oversights but substantive shortcomings that directly undermine the legitimacy of the application. In accordance with established principles, where compliance is not demonstrated or where deficiencies exist, these factors must weigh decisively against the granting of consent.

In conclusion, the applicant has not fulfilled the essential responsibility to prove adherence to all statutory and policy requirements. This failure constitutes a clear and compelling reason to refuse consent.

1.1.222 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal fully satisfies the impact criteria set out in NPF4 Policy 11, which governs support for renewable energy development. While the policy endorses such development, this endorsement is explicitly conditional upon compliance with its detailed impact provisions, including those relating to communities and landscapes.

In particular, Policy 11(c) requires that impacts on communities be carefully considered, while Policies 11(d) and 11(e) address the effects on landscape, seascape and other receptors. The evidence indicates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded from detrimental impacts.

Furthermore, the ecological assessments submitted have not shown that the necessary tests can be met. Taken together, these concerns suggest that the proposal conflicts with the impact criteria embedded within Policy 11 and therefore does not fully benefit from the policy’s support for renewable energy. This raises fundamental questions about the appropriateness of the development in this location.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that collectively safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on the characteristics for which they are designated. Additionally, Policy 7 addresses the protection of scheduled monuments

and the settings of historic assets, with particular reference to Policies 7(h), 7(c), and 7(d). Policy 3 further outlines the requirements for the conservation of biodiversity. Taken together, these policies establish a comprehensive framework intended to ensure that developments do not undermine the integrity of nationally significant environmental and cultural resources.

An assessment of the proposal against these policies reveals clear conflicts. It would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the protections afforded by Policies 4(c) and 4(d). Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, thus failing to satisfy the requirements of Policy 7. The safeguarding of island communities, which is also a consideration under these policies, has not been assured. Finally, the ecological tests required under Policy 3 have not been evidenced as being capable of compliance based on the material submitted. Consequently, the proposal does not meet the standards set out in these relevant NPF4 policies and cannot be supported.

Uncertainty remains as to whether the proposal can be reconciled with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This conflict with the development plan framework is clear and extends to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome. Therefore, it must be concluded that the proposal is inconsistent with the relevant terrestrial development plan policies.

1.1.223 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable description of the likely effects that the Scottish Ministers are being asked to consent

to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

When considering the visual impact of the proposed development, it is important to compare the extent to which mitigation measures can address potential adverse effects. While landscaping and screening can reduce visibility from certain viewpoints, the effectiveness of such measures is inherently limited by the nature of the terrain and the scale of the development. This highlights the need for a careful and nuanced assessment of visual impacts, rather than reliance on visualisation materials alone.

The visual evidence presented in support of the application follows NatureScot's visualisation guidance, which the applicant adopts. This guidance acknowledges a fundamental limitation: printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Consequently, the images and wireline drawings—although useful—are constrained by the same photographic basis and do not independently correct the viewer's perception. The wireline drawings, presented within the panoramic projections, serve as a technical overlay rather than a definitive representation of the development's visual presence.

Given these technical and perceptual limitations, it is essential that decision-makers exercise caution when interpreting the visualisation materials. They should consider the potential discrepancies between the images and the actual experience on site, particularly in relation to the scale and prominence of the development. Such an approach ensures a balanced assessment that recognises the value of the visualisations while acknowledging their inherent constraints.

There remains uncertainty regarding the long-term implications of introducing aviation and navigation lighting to a previously unlit sea horizon. The development would permanently alter the character of the night-time seascape for its stated 35-year operational life. Importantly, this operational timeframe does not limit the policy harm, as consenting to the development effectively deems the seascape appropriate for wind farm use. This decision carries significant weight in shaping future use and preservation of the seascape, underscoring the need for careful consideration of lighting impacts before granting consent.

1.1.224 Cultural Landscape, Archaeology and Historic Environment

There is a notable uncertainty regarding the reliability of the applicant's assessment of heritage impacts, stemming from concerns about its adherence to the prescribed methodology. Although the applicant states that Historic Environment Scotland's recognised methodology has been adopted—one developed and refined through consultation with the authority—questions remain as to whether the assessment has properly evaluated the effects on the setting of historic assets. This methodology requires not only identifying changes to setting but also determining how those changes affect the contribution that the setting makes to the cultural significance of heritage assets, including whether the integrity of the setting is adequately retained. Crucially, it emphasises that visual change alone should not be equated directly with adverse impact.

However, a detailed Methodological Audit, conducted in support of community objections and based entirely on the applicant's own Appendix 14.3, casts doubt on the robustness of the assessment. The Audit finds that while the operational assessment does identify relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the accepted methodology. The assessment appears to describe visual changes but does not undertake the essential evaluative step required to determine the true impact on the setting's integrity. This omission is evident in all the worked examples reviewed by the Audit.

In light of these findings, it is uncertain whether the applicant's conclusions about the retention of setting integrity can be relied upon. The absence of a clear, methodologically sound evaluation undermines confidence that the heritage impacts have been properly assessed and calls into question the validity of the assessment's assurances regarding the adequacy of setting retention. This uncertainty must be addressed before any firm conclusions can be drawn about the heritage effects of the proposed development.

The applicant's assessment recognises the cultural significance of the affected heritage assets as stemming from dynamic experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the interconnectedness of monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through movement rather than fixed viewpoints. However, the mitigation measures proposed appear insufficient to address the potential impacts on these broader cultural and experiential dimensions.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this inadequacy by requesting additional viewpoints to better capture and represent these wider qualities. This highlights a clear need for a more comprehensive assessment that fully encompasses the cultural landscape's intangible attributes. Without such consideration, the impact on the heritage assets may be underestimated, and the cultural significance inadequately protected.

The applicant's evidence acknowledges that the heritage conclusions presented in the proposal are fundamentally reliant upon the findings of the accompanying landscape assessment. It is expressly noted that where the landscape effects have been understated, as detailed previously, the resulting heritage impact conclusions inevitably reflect and perpetuate this understatement. This interdependence between the landscape and heritage assessments is critical because any deficiencies or minimisations within the landscape evaluation directly compromise the reliability of the heritage conclusions. Consequently, the extent of harm or impact to heritage assets may be significantly greater than suggested if the landscape effects have not been fully or accurately appraised. In light of this, the credibility of the heritage impact assessment is undermined, and caution should be exercised in accepting these conclusions without further independent verification.

The application fails to provide the necessary assessment to demonstrate protection of internationally and nationally important heritage assets, as required by NPF4

Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their setting. This absence of evidence means the cultural significance of these assets and their surroundings cannot be assuredly preserved.

Furthermore, the proposal does not comply with the requirements set out in GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively underscore the importance of safeguarding heritage within planning decisions. Without a robust demonstration of how these policies are met, there remains a substantial risk of harm to heritage assets.

In light of these shortcomings, the Scottish Ministers are deprived of the critical information necessary to conclude that the development would protect heritage assets appropriately. Consequently, the application should not be approved as it does not satisfy the essential policy safeguards for heritage protection.

1.1.225 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

While mitigation measures have been proposed to address potential socio-economic impacts on island communities, the applicant's assessment methodology remains fundamentally flawed and insufficient. Notably, the applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities. However, no specific assessment of the habitability of the affected islands was undertaken. Instead, Chapter 18 of the socio-economic assessment focuses primarily on regional-level analysis, examining port communities in detail but neglecting an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without robust, localized analysis.

This approach fails to account for the unique economic characteristics of small island communities, which are not accurately represented by regional averages. Island economies tend to be highly concentrated in sectors directly dependent on the qualities that attract visitors, such as tourism and related services. Rather than diminishing sensitivity, this reliance on increasing visitor numbers intensifies dependence on those very qualities that may be at risk from the proposed development. Therefore, the conclusion of low sensitivity to tourism impacts, derived without any place-based analysis, cannot be considered evidence-based but instead

represents an unsubstantiated assumption. Consequently, the socio-economic assessment does not provide a reliable basis for understanding or mitigating potential impacts on island communities.

There remains significant uncertainty as to whether the proposal complies with the necessary policy and statutory requirements concerning island communities. The proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence and that a precautionary approach be adopted where such evidence is lacking. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given appropriate weight through meaningful engagement throughout the planning process. However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to carry out the required assessment to understand the proposal's effects on them. Consequently, it has not been demonstrated that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Given these shortcomings, the proposal does not meet the requisite standards for protecting island communities and should therefore be refused.

1.1.226 Ecology, Biodiversity and Habitats Regulations

The development area is of considerable ecological significance, encompassing Priority Marine Features and Annex I habitats within its boundaries. Furthermore, the adjacent waters provide habitat for a range of protected species, including seabirds, marine mammals, and basking sharks. This concentration of sensitive marine biodiversity underlines the environmental importance of the site and its surroundings.

The proposed development would introduce large-scale construction, operational, and decommissioning activities into this ecologically sensitive environment over a prolonged period extending to several decades. Such extensive and sustained disturbance carries the potential for significant adverse environmental effects, raising concerns about the long-term impacts on the Priority Marine Features and the protected species dependent on these habitats. Careful consideration of these factors is essential in the assessment of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their submission constitutes a significant aspect of the application, acknowledging that, according to the applicant's own approach, Scottish Ministers may arrive at a different conclusion regarding potential adverse effects. This recognition underscores the applicant's awareness of the potential environmental impacts and their intent to address these through appropriate derogation provisions.

The applicant's evidence clearly establishes that under the Habitats Regulations, consent for developments potentially impacting protected habitats and species can only be granted when the competent authority has ascertained that the proposal will

not adversely affect the integrity of the protected site. This requirement is absolute unless the strict derogation tests are satisfied. Crucially, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The evidential burden lies with the applicant to demonstrate this to the requisite standard. Importantly, proposals for mitigation, compensation, or future monitoring, while relevant, do not in themselves satisfy the statutory tests or guarantee lawful consent.

This legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embed the stringent requirements of the Habitats Regulations within the planning system, ensuring that developments affecting designated sites are rigorously assessed. The high evidential threshold and comprehensive policy context emphasize the necessity for applicants to provide robust, conclusive scientific evidence demonstrating no adverse impact before consent can be lawfully granted. This ensures the protection of sensitive ecological interests in accordance with statutory and policy mandates.

Considerable uncertainty remains regarding the applicant's ability to meet the stringent statutory tests designed to safeguard internationally important habitats and species. Despite the submission of derogation documents intended to address these requirements, the evidence put forward fails to provide the necessary assurance that these critical ecological protections will be upheld. This lack of demonstrable certainty calls into question the soundness of the application in fulfilling its legal obligations.

Given this unresolved uncertainty, the case for granting consent is fundamentally undermined. Without clear and conclusive evidence that the statutory tests have been satisfied, the proposed development risks causing harm to protected ecological features of international importance. In light of these concerns, it is appropriate to conclude that the application should not be approved.

1.1.227 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed as it fragments essential components, notably deferring the export cable corridor and onshore transmission works to separate applications. This segmentation precludes a comprehensive evaluation of the project's cumulative effects, as these critical elements are not considered alongside the wind farm itself. Without assessing these interconnected parts together, it is impossible to fully understand the overall environmental and operational impacts, undermining effective mitigation and regulatory oversight.

This method conflicts with established legal principles, particularly the precedent set in Raeshaw Farms, which mandates that a project must be evaluated in its entirety rather than divided into smaller parts whose individual impacts may seem less significant. By salami-slicing the project, the assessment bypasses a holistic review, potentially allowing adverse effects to be overlooked until after the principal decision has been made. Such an approach is procedurally unsound and risks non-compliance with statutory requirements for comprehensive project appraisal.

The cumulative impact assessment presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment (EIA). As established, the underlying evaluations of landscape, heritage, and socio-economic effects have been shown to understate the true scale of impacts. Consequently, the baseline from which the cumulative effects are measured is inherently reduced, reflecting an incomplete or diminished understanding of the existing environmental and social context.

This flawed baseline directly compromises the reliability of the cumulative assessment. When the combined effects of the current proposal are considered alongside other existing, consented, and foreseeable developments, the aggregated impacts are likewise underestimated. Therefore, the cumulative assessment fails to provide a robust or accurate account of the true scale of combined effects, undermining its utility for informed decision-making and potentially leading to inadequate mitigation or planning responses.

The applicant's submission fails to adequately demonstrate compliance with key planning policies and environmental regulations concerning project splitting and the assessment of cumulative effects. Specifically, the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations necessitate a comprehensive and integrated evaluation of the proposal's overall impacts, including those arising from deferred works. Without such an assessment, the potential for significant adverse effects may be underestimated or overlooked, undermining the robustness of the environmental appraisal.

In light of this, it is essential that the decision-making process explicitly addresses how deferred works will be treated and assessed in combination with the current proposal. Only through a transparent and thorough consideration of all project elements can compliance with policy and regulatory standards be assured. Therefore, I request that the treatment of deferred works be expressly incorporated into the determination to ensure that cumulative and in-combination effects are reliably identified and assessed in accordance with the relevant statutory requirements.

1.1.228 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the weight the Scottish Ministers are asked to place on the site-selection process renders the quality of public participation in that process directly material. However, significant deficiencies in participation during both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case. Furthermore, GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, require that those affected have a realistic opportunity to engage with decisions of this magnitude. The conditions imposed on the affected communities fall short of this standard, thereby undermining the

legitimacy of the site-selection process. It is therefore imperative that Ministers give due regard to these deficiencies when considering the representations made.

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.229 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly

concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the

effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

1.1.230 Personal Observations

In addition to the planning matters above, I am personally concerned because: The energy produced is generated in Scotland and will not benefit Scotland, as it is phased into the Welch/English grid.
There are no contingency plans in case of an (energy) emergency.
The turbines are unprotected from attacks by foreign forces and terrorist activity.

1.1.231 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant's documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 124
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of applications 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recognised as a formal objection, that I am duly registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals envisage the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. This facility would consist of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The project site encompasses a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment situated north-west of Islay and west of Colonsay. It is located approximately 21 kilometres from Iona and lies in proximity to the islands and coastal settlements within the southern Hebrides.

The following sections outline the grounds for objection, grounded firmly in the statutory and policy context applicable to the determination of these applications. It is important to emphasise that the onus lies with the applicant to provide adequate and compelling evidence demonstrating that all relevant statutory tests and policy requirements are met. The burden of proof does not rest with objectors to disprove the proposals. Having carefully considered the submissions and supporting documentation, it is evident that the applicant has failed to satisfy this evidentiary burden. Therefore, for the reasons elaborated below, it is concluded that consent for the proposed development ought to be refused.

1.1.232 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties imposed by Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Moreover, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in their determination, are equally bound to have regard to these statutory duties.

In the present case, the application fails to demonstrate compliance with these requirements. There is a lack of clear evidence that the applicant has adequately considered the preservation of natural beauty or the conservation of flora, fauna, and geological or physiographical features of special interest. Similarly, the protection of sites, buildings, and objects of architectural, historic, or archaeological interest has not been sufficiently addressed. The absence of reasonable steps to mitigate adverse effects further compounds these deficiencies.

Given these shortcomings, the application does not meet the statutory obligations set out in Schedule 9 of the Electricity Act 1989. Where such compliance has not been demonstrated, and where evidence identifies deficiencies and omissions in relation to the applicable legal and policy framework, these matters must weigh against the granting of consent. Therefore, the application should be refused on the basis that it fails to satisfy the statutory duties under Schedule 9.

The marine licence application under consideration is subject to determination pursuant to Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must be made in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The applicant's submission is required to demonstrate compliance with a suite of General Policies integral to the statutory assessment process. These include GEN 4 concerning Co-existence, GEN 6 alongside paragraphs 4.22 to 4.23 addressing the Historic Environment, GEN 7 with paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 with paragraph 4.81 on Sound Evidence, and GEN 21 with paragraph 4.85 on Cumulative Impacts. The application as presented fails to provide adequate evidence of conformity with these policies, which collectively form the legal and policy framework governing marine licencing decisions in Scotland.

In particular, the application does not satisfactorily demonstrate compliance with the requirements for sound evidence as stipulated in GEN 19 and paragraph 4.81, nor does it adequately address cumulative impacts as required by GEN 21 and paragraph 4.85. The absence of robust evidence and the presence of deficiencies and omissions in the applicant's submission constitute a failure to meet the statutory criteria. According to the established legal position, where compliance with the National Marine Plan policies has not been demonstrated, or where the evidence reveals conflicts or shortcomings relative to the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. Consequently, the marine licence application should be refused on the grounds that it does not satisfy the statutory requirements of the Marine (Scotland) Act 2010 nor the relevant policies of the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies are directly engaged by the proposal and set clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy. The absence of demonstrated compliance with these policies indicates that the proposal does not meet the necessary legal and policy standards required under NPF4.

Furthermore, the evidence identifies deficiencies and omissions in the application's assessment and supporting documentation, resulting in conflicts with the applicable legal and policy framework. Where compliance has not been demonstrated, or where such deficiencies exist, these matters weigh against the granting of consent. The failure to adequately address the requirements of NPF4's relevant policies

undermines the proposal's conformity with the statutory planning framework and justifies objection on these grounds. Consequently, the proposal should not be approved as it stands, given its clear non-compliance with essential national planning policies designed to protect biodiversity, natural places, historic assets, and energy considerations.

The proposal fails to provide an adequate environmental impact assessment as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of such a comprehensive and compliant assessment means that the decision-making authority cannot properly evaluate the environmental consequences of the development, undermining the statutory process and rendering the application incomplete.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence identifies deficiencies and omissions in this regard, with no satisfactory demonstration that the proposal will not adversely affect the integrity of protected habitats. Given these failures to meet the legal requirements for environmental impact and habitats regulations assessments, the application conflicts with the relevant legislative and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, thereby undermining a fundamental statutory requirement that must inform the decision-making process. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight when determining planning applications affecting such communities. This statutory obligation is not discretionary but a legal imperative designed to ensure that the unique circumstances and needs of island populations are adequately reflected and protected in planning decisions.

In this instance, the evidence before the determining authority does not demonstrate compliance with this statutory duty. There is a clear absence of any substantive assessment or meaningful engagement that addresses how the proposal impacts the island community's social, economic, or environmental interests. The failure to provide such consideration constitutes a significant omission and a procedural deficiency in the planning process. Without a proper evaluation of the proposal's effects on the island community, the decision-making framework is incomplete and legally flawed.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in addressing the interests of island communities, these shortcomings must weigh against the granting of planning consent. The statutory framework and associated policy guidance are unequivocal in requiring that such failures be treated as material considerations adverse to the proposal.

In conclusion, the proposal does not meet the requirements of the Islands (Scotland) Act 2018 due to its failure to properly consider and give due weight to the interests of island communities. This failure represents a fundamental legal and procedural defect that should result in the refusal of planning permission.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to meet this burden. Where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given the absence of conclusive evidence proving adherence to all statutory duties and planning policies, the application should be refused on the basis that the applicant has not fulfilled the necessary legal and policy requirements.

1.1.233 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria outlined in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Specifically, Policy 11 sets out clear requirements under subsections (c), (d), and (e) regarding the protection of communities, landscapes, seascapes, and other important receptors. The evidence demonstrates that the development would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been convincingly shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests and wellbeing of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to meet the necessary tests required by the policy.

This lack of compliance with the stated impact criteria is fundamental and cannot be overlooked. NPF4 Policy 11's support for renewable energy is explicitly conditional upon these impacts being appropriately managed and mitigated. Since the proposal does not meet these essential conditions—failing to protect valued landscapes, cultural heritage, community interests, and ecological integrity—it conflicts directly with the policy's provisions. Consequently, the proposal should not be afforded the policy's presumption in favour, as doing so would set a precedent contrary to the careful balance sought by national planning policy.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies that safeguard nationally important landscapes, heritage assets, and biodiversity. As outlined in Policy 11, alongside Policy 4(c) and 4(d), there is a clear requirement to protect National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7, including subsection 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, mandates

protection of cultural heritage. Policy 3 further requires that biodiversity considerations be met.

In this instance, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the protections envisaged by these policies. It has not been demonstrated that the cultural significance of scheduled monuments and their settings would be maintained, nor that the integrity of island communities would be safeguarded. Furthermore, the ecological assessments provided fail to meet the necessary tests required under Policy 3, as the evidence submitted does not establish that these standards can be satisfied. Consequently, the proposal is in conflict with these relevant NPF4 policies designed to protect designated assets.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts demonstrate a clear conflict with the policies designed to protect these valued local attributes. Consequently, the proposal fails to accord with the relevant development plan framework and, when considered alongside National Planning Framework 4 in its entirety, this inconsistency remains unaddressed by the applicant. On this basis, the proposal should be refused as it is fundamentally at odds with the established planning policies intended to preserve the terrestrial environment.

1.1.234 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being

asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

When comparing the proposed mitigation measures, it is important to recognise that the visualisation materials submitted in support of the assessment possess inherent limitations that affect their reliability as a tool for fully understanding visual impacts. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This fundamental shortcoming means that any mitigation strategies evaluated primarily through such visualisations may not reflect the actual visual experience on site.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. They serve as a technical rendering within the overall visualisation package rather than functioning as an independent means to correct or enhance visual accuracy. Consequently, reliance on these materials without acknowledging their technical and perceptual limitations risks underestimating or misrepresenting the visual effects of the development. This calls for caution in drawing firm conclusions from the visual evidence as currently presented.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape, which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The effects identified engage several provisions, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Critically, the applicant has failed to demonstrate that its conclusions about the scale of these acknowledged effects align with its own assessment methodology. Moreover, no satisfactory evidence has been provided to confirm that the proposal complies with policies aimed at protecting nationally important landscapes and seascapes. On this basis, it cannot be concluded that the proposal meets the necessary policy requirements.

1.1.235 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant's Appendix 14.3 and submitted in support of community objections, identifies significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant's own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment's conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a combination of factors, including pilgrimage, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately captured and represented. This suggests that the current assessment may not fully encompass the depth of the heritage assets' cultural significance, potentially leading to an incomplete understanding of the impacts. Therefore, it is essential that the evaluation of heritage effects incorporates these wider landscape and experiential factors to inform a more comprehensive and appropriate heritage impact assessment.

The heritage impact conclusions presented rely fundamentally on the findings of the landscape assessment. However, when the landscape effects are understated, as previously demonstrated, this understatement directly transfers to and compromises the accuracy of the heritage conclusions that are constructed upon them. In this regard, the mitigation measures proposed cannot be fully trusted to address the true extent of harm, since their basis—the landscape assessment—is itself deficient.

This reliance on an incomplete landscape evaluation weakens the overall credibility of the heritage impact appraisal. If the landscape effects are not accurately assessed and articulated, the subsequent heritage conclusions inevitably fail to reflect the genuine magnitude of impact on heritage assets. Consequently, the robustness of the planning decision-making process is undermined, and the potential for effective mitigation is diminished. This fundamental flaw calls for a reassessment of the landscape evidence before any definitive heritage impact conclusions are accepted.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.236 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant’s own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant’s inadequate socio-economic assessment methodology is that the potential adverse impacts on island communities affected by the proposal remain insufficiently understood and unmitigated. The applicant’s own consultants acknowledged habitability as a potentially significant pathway through which the development could affect these island communities. Yet, no direct assessment of the habitability of the islands likely to be impacted was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly at a regional scale, concentrating detailed analysis on port communities while neglecting a comparable place-based evaluation of the island communities themselves. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This conclusion is fundamentally flawed. Small island economies cannot be equated with regional averages; their economic structures are heavily concentrated in sectors most vulnerable to changes in the qualities that attract visitors. The islands’ reliance on increasing visitor numbers does not mitigate their sensitivity to potential adverse

effects; on the contrary, it intensifies their dependence on the very attributes that the proposal risks undermining. Drawing a conclusion of low sensitivity without conducting a thorough, place-specific analysis is therefore not supported by evidence but represents an unsubstantiated assumption.

In summary, the applicant's socio-economic assessment fails to provide a robust or credible understanding of the impacts on island communities. This gap undermines the reliability of the conclusions reached and leaves the risks to these vulnerable communities insufficiently addressed.

There remains significant uncertainty regarding the proposal's compliance with the necessary planning and statutory requirements relating to island communities. The relevant policy framework, including GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. This proposal falls short of these standards.

The applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the comprehensive assessment required to understand fully the proposal's effects upon these communities. Consequently, it has not demonstrated compatibility with the objective of sustaining viable island communities, nor has it discharged the statutory duties owed to them. In light of these deficiencies, the proposal cannot be considered compliant with the established policy and statutory framework protecting island communities.

1.1.237 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a scale of construction, operation, and decommissioning activity that would extend over several decades within an ecologically sensitive marine environment. Mitigation measures for such large-scale projects are typically designed to minimise disturbance to local ecosystems; however, the presence of Priority Marine Features and Annex I habitats within the development area itself indicates a heightened vulnerability. Surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks, all of which are species that require careful consideration due to their protected or conservation status.

Given this context, the potential for significant adverse environmental effects arising from the development cannot be discounted. The extensive duration and intensity of the proposed activities may lead to habitat degradation and disturbance to protected species, challenging the effectiveness of standard mitigation strategies. Therefore, the ecological importance and sensitivity of the site, as well as the surrounding marine environment, warrant rigorous assessment and cautious decision-making to ensure that any impacts are thoroughly understood and appropriately managed.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan has practical consequences for the

assessment of the proposed development. These documents acknowledge the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, signalling that the applicant does not categorically rule out impacts on the site's integrity. The preparation and inclusion of such derogation and compensation measures indicate an intention to address these potential impacts through established regulatory mechanisms, should they be deemed unavoidable.

However, it is important to recognise that the submission of these documents also reflects an inherent uncertainty in the applicant's assessment. By their own approach, the Scottish Ministers may reach a different conclusion on whether adverse effects can be excluded, underscoring that the application relies on conditional mitigation rather than definitive avoidance. This distinction is critical in evaluating the robustness of the proposed measures and the likelihood that they will satisfactorily protect the integrity of the protected site.

Consent for developments affecting protected habitats and species can only be granted where it is conclusively demonstrated that there will be no adverse effect on the integrity of the protected site, unless the strict derogation tests under the Habitats Regulations are satisfied. The competent authority must be certain that no reasonable scientific doubt remains regarding the proposal's impacts. This high evidential standard places the burden of proof firmly on the applicant. Importantly, mitigation measures, compensation proposals, and future monitoring arrangements alone do not suffice to meet the statutory requirements. This legal framework is reinforced by the Habitats Regulations and is further engaged through relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f). In summary, planning consent in these circumstances demands robust, unequivocal evidence that statutory tests are fully satisfied before permission may lawfully be granted.

There remains significant uncertainty as to whether the statutory tests designed to protect internationally important habitats and species can be satisfied in this case. On the evidence submitted, including the applicant's own derogation documents and the degree of certainty they reveal, it is clear that the applicant has not demonstrated compliance with these essential legal requirements. This fundamental failing undermines the justification for granting consent and must weigh heavily against the approval of the application.

1.1.238 Cumulative and In-Combination Effects

The evidence demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to future applications. As these elements are essential for the wind farm's operation, their exclusion from the present assessment results in the whole project's effects never being considered collectively. This fragmented approach means that significant impacts will be evaluated in subsequent consenting processes, following the principal decision, rather than in a comprehensive manner at the outset.

Such a methodology is procedurally and legally unsound, as it conflicts with the established principle upheld by the courts in Raeshaw Farms. This principle mandates that a project must be assessed in its entirety and not subdivided into smaller parts that individually appear less significant. By salami-slicing the project, the current assessment fails to provide a complete understanding of its overall environmental and planning implications, undermining the integrity of the decision-making process. Consequently, the current approach should be reconsidered to ensure a holistic evaluation of the entire project.

While mitigation measures are often highlighted to address environmental impacts, it is critical to scrutinise the reliability of the cumulative impact assessment itself. The assessment relies fundamentally on baseline data derived from the Environmental Impact Assessment, which has been shown to understate effects on landscape, heritage, and socio-economic factors. Because the cumulative assessment uses this reduced baseline, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. Consequently, the cumulative impact assessment cannot be regarded as a reliable indicator of the true extent of combined effects, undermining confidence in its conclusions.

The proposal, as presented, fails to adequately address the cumulative and in-combination effects of the development, which raises significant concerns regarding compliance with key planning and environmental requirements. Without a reliable assessment of the project as a whole, including deferred works, there is a risk that the full environmental impact has not been properly understood or mitigated. This omission may lead to unforeseen adverse consequences that could have been avoided through a more thorough evaluation.

This oversight constitutes non-compliance with established policies and regulations, specifically GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations relating to project splitting. These frameworks require that projects be considered in their entirety to ensure that cumulative effects are fully captured and addressed. The applicant’s failure to demonstrate adherence to these requirements undermines the integrity of the decision-making process and conflicts with national planning objectives.

In light of these concerns, it is essential that the determination explicitly considers the deferred elements of the project and their combined impacts. Only through comprehensive assessment can the decision-making authority ensure that the proposal complies with policy and regulatory standards, thereby safeguarding environmental interests and supporting sustainable development. It is requested that this issue be formally recognised and rectified before any approval is granted.

1.1.239 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself

comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application’s reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.240 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant’s assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as

a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

The applicant's assessment notably underestimates the scale and significance of the visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects that cannot be adequately mitigated. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development and extensive visibility across a large geographical extent. The overall effect is described as moderate and significant, with turbines visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility; the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point.

Crucially, Iona's monastic landscape—which encompasses the Abbey, the Nunnery, and the high crosses—is of international heritage importance. Its significance is closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints from sensitive locations, including the ferry crossing itself; however, the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in understanding the full visual impact on this heritage setting. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's consultants did not assess habitability—a potential pathway of effect on the community identified in their own reports.

The perceived scale of the turbines can be contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree stands at 141 metres and is visible from Iona at approximately 33 kilometres. The proposed turbines would exceed Ben Hynish by about 194 metres in height, despite being situated at roughly two-thirds of that distance, thus dominating the skyline to a far greater extent than existing landmarks. Taken together, these factors demonstrate that the applicant's assessment fails to capture the true magnitude of impacts on Iona's visual environment, community well-being, and internationally important heritage assets. As such, the assessment lacks the necessary accuracy and comprehensiveness to inform appropriate mitigation or decision-making.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, attributing a High sensitivity at distances of approximately 22 to 24 kilometres and a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition that Fionnphort—the gateway to Iona and the embarkation point for visitors—is the community most directly affected by changes to visitor flows. Across Mull, the applicant similarly accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet it is attributed no more than Medium magnitude of impact.

This assessment, however, demonstrates an overreliance on distance-based reasoning that inadequately captures the significance of effects on key coastal areas. For example, the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the scale of change is judged small due to a viewing distance exceeding 30 kilometres, exemplifies this limited approach. Such a methodology fails to account for the qualitative importance of these landscapes to local communities and tourism.

Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, is fundamentally dependent on the Atlantic seascape that the proposed development would industrialise. Despite this, no place-based assessment has been provided for these communities. Consequently, the applicant's evaluation underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull's coastal landscapes and the tourism-dependent populations that rely upon them.

The applicant's assessment notably underestimates the practical consequences for important designated landscapes and vulnerable island communities, risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a prime example. This small, re-establishing community depends critically on the unspoilt seascape and setting that are at risk; yet, no assessment has been undertaken to consider how the development might affect its ongoing regeneration.

Similarly, the applicant's evaluation of Staffa, located approximately 35 kilometres from the development site and also within the Loch na Keal National Scenic Area, is inadequate. Despite NatureScot's guidance to assess effects up to 30 kilometres, the applicant dismisses the significance of impacts beyond this range, concluding only a small scale of change and non-significant effect at Staffa. This is inconsistent with their own recognition of the island's panoramic maritime qualities and fails to fully acknowledge the potential extent of visual and experiential impacts on one of Europe's most celebrated small islands.

The assessment of the Jura National Scenic Area and the Scarba, Lunga and the Garvellachs National Scenic Area similarly downplays potential impacts by attributing Medium to Low magnitudes of effect based mainly on distance and retained landforms. However, these designations rest on the wild, undeveloped character of their Atlantic outlooks, which may be compromised by changes in seascape

character even at distances of 28 to 40 kilometres. Together, these omissions and underestimations weaken the protection afforded to these landscapes and island communities, which rely on the preservation of their distinctive natural and cultural environments.

The applicant's assessment characterises the South Tiree coastal area as possessing High sensitivity at a distance of approximately 35 kilometres while attributing a Low magnitude of change to the proposed development. This classification underpins the overall evaluation of the effects on Tiree's landscape character. However, this Low magnitude conclusion appears to underestimate the true extent of visual and perceptual impact that would arise from the introduction of large-scale turbines into this setting.

Tiree's landscape is uniquely defined by its exceptional low-lying topography, where the prominence of sea and sky shapes its distinctive character. The island's highest elevation, Ben Hynish, reaches only 141 metres, emphasising the openness and expansive nature of the oceanic horizon. The proposed turbines, reaching heights of up to 335 metres, would therefore represent unprecedented vertical elements within this seascape. Their scale and prominence would disrupt the island's characteristic sense of openness and natural order, introducing features that are entirely discordant with the existing landscape.

Given this context, the conclusion that the magnitude of change would be Low does not adequately reflect the sensitivity of Tiree's receptor or the scale of change introduced. The applicant's evaluation consequently presents an unreliable estimate of effects, failing to capture the significant alteration that such structures would impose on the island's sensitive and distinctive landscape character. This underestimation warrants careful reconsideration to ensure that the assessment fully recognises the true magnitude of impact on Tiree.

The applicant's failure to assess the effects of the proposed development on mainland and island communities such as Gigha, Ardnamurchan Point, and the west coast of Kintyre has practical consequences that undermine the thoroughness of the environmental assessment. Gigha, a community-owned island renowned nationally for its regeneration, faces the development site from the east; yet, no examination has been undertaken regarding how the project might impact its delicate community balance and local economy. Similarly, Ardnamurchan Point, the most westerly tip of the British mainland, offers panoramic views along the Hebridean seaboard that are a significant draw for visitors to the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation applied in the applicant's assessment, meaning that potentially significant visual and economic effects have been overlooked.

Furthermore, the chain of communities along Kintyre's west coast depends heavily on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which shapes their character and supports their visitor economies. This reliance extends to the Treshnish Isles and other small islands and mainland coasts with views towards the development area, all of which share a similar sensitivity to changes in the seascape. By omitting these receptors from the assessment, the applicant's evaluation fails to capture the full scope of socio-economic and visual

impacts, thereby compromising the comprehensiveness and reliability of the conclusions drawn. In light of these omissions, the application should be reconsidered with a more inclusive and detailed assessment of effects on these communities to ensure informed decision-making.

The applicant's assessment systematically moderates and discounts the magnitude of change affecting highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of environmental effects on these receptors, as the assessment reduces the perceived significance of impacts solely based on distance. Such a methodology fails to account adequately for the true extent of change experienced by these communities.

Consequently, the effect on populations living beyond this arbitrary threshold remains insufficiently evaluated. These communities, which bear the consequences of the development, have received no place-based assessment to reflect their specific circumstances and sensitivities. This omission undermines the thoroughness and accuracy expected in a robust environmental impact assessment.

In summary, the applicant's distance-based approach compromises the integrity of the assessment by systematically discounting effects beyond 20 kilometres without proper justification. For the assessment to be comprehensive and reliable, it must address the significant impacts on all sensitive receptors irrespective of distance, ensuring that all affected communities are properly considered.

1.1.241 Personal Observations

Based on my own local knowledge, I also wish to highlight that: This is an area of rich biodiversity and stunningly natural beauty which should be preserved for future generations

Finally, I would also ask the Scottish Ministers to consider: I would urge the ministers to visit the area to fully appreciate why this stunning landscape and rich biodiversity must be fully preserved for future generations, and not destroyed by profit driven companies. It is enjoyed and greatly cherished by locals and tourists
alike.
Please do the right thing for our beautiful country and reject this proposal.

1.1.242 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes as well as on the heritage and communities along this coastal region. Further scrutiny of the applicant's published documents reveals that these impacts have been understated, with a necessary heritage assessment notably absent. Moreover, while the effects on the island communities affected by the development were identified, no formal assessment of these impacts has been undertaken. Ecological criteria essential to the project's approval have not been demonstrated as achievable, and it must be noted that only a portion of the entire project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the corresponding marine licence. Should the Ministers be inclined to grant consent, I request that they mandate the submission of additional environmental information and enhanced visual representations. Furthermore, I recommend that the determination of the applications be deferred until after a public inquiry, thereby allowing for a thorough examination of the concerns raised in this objection.

Irrespective of the final decision, I also ask that the Scottish Ministers explicitly address and document their conclusions regarding the development's impact on cultural heritage and the affected island communities within their reasons for decision.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 125
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, comprising applications 00012385 and 00012386. These seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited (ScottishPower Renewables). I request that this submission be recorded as an official objection, that I be registered accordingly, and that I am informed of the final determinations made on these applications.

The development in question involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning around 448 square kilometres. This site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the southern Hebrides islands and their coastal communities.

The following exposition details the grounds for objection, rooted firmly in the statutory and policy context governing the determination of these applications. It is incumbent upon the applicant to substantiate, through robust and comprehensive evidence, that all relevant statutory tests and planning policies are met. The onus does not lie with objectors to disprove the application. In this instance, the applicant has failed to meet that evidential burden, and accordingly, consent should be withheld.

1.1.243 Legislative and Policy Framework

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. As the authorisation decision must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies is a fundamental procedural and substantive defect. This failure undermines the statutory basis for granting consent and renders the application legally deficient.

Specifically, the application does not adequately address compliance with General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively require a thorough and evidenced assessment of environmental, cultural, and social factors, as well as meaningful engagement and consideration of cumulative effects. The absence of such evidence and assessment constitutes a clear omission and conflict with the applicable legal and policy framework.

Given these deficiencies and the failure to demonstrate compliance with the statutory and policy requirements, the application cannot lawfully be granted consent. The

Marine (Scotland) Act 2010 and the National Marine Plan impose a mandatory obligation to refuse authorisation where compliance is not established. Therefore, on the grounds of non-compliance with the statutory framework and relevant National Marine Plan policies, this marine licence application should be refused.

The proposal under consideration fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which are directly engaged by this development. NPF4 is a significant material consideration that must be applied in conjunction with the relevant statutory duties and legislative requirements. The absence of demonstrated compliance with these policies, and the presence of identified deficiencies and omissions in the submitted evidence, weigh decisively against the granting of consent.

Policy 3 (Biodiversity) requires that developments protect and enhance biodiversity. The application fails to provide sufficient evidence that biodiversity will be maintained or improved. There is no clear demonstration that the proposal avoids harm to protected species or habitats, nor that any biodiversity net gain will be achieved. This omission is critical, given the statutory duties to conserve biodiversity under the Environment Act 2021 and related legislation.

Policy 4 (Natural Places) mandates the safeguarding of natural places and landscapes. The proposal does not adequately assess or mitigate its impact on the natural environment. The evidence lacks a comprehensive evaluation of effects on designated natural sites or landscape character, and no effective measures are proposed to prevent degradation. This failure conflicts with the policy's objective to maintain the integrity and quality of natural places.

Policy 7 (Historic Assets and Places) requires that developments conserve and enhance the historic environment. The application does not sufficiently address the potential impacts on designated or non-designated heritage assets. The absence of a thorough heritage impact assessment or appropriate mitigation measures contravenes the policy's requirements and statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Policy 11 (Energy) sets out criteria for energy developments, including the need to demonstrate compliance with environmental and social safeguards. The proposal does not provide adequate evidence that it meets these criteria. There is a lack of clarity on how the development aligns with energy policy objectives while respecting environmental constraints, resulting in a failure to satisfy Policy 11.

In summary, the proposal's failure to demonstrate compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4, combined with the identified deficiencies, omissions, and conflicts with the applicable legal and policy framework, constitutes a significant planning concern. These matters weigh against the granting of planning consent.

The proposal fails to comply with the mandatory requirements of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any

determination. This failure to provide an adequate environmental impact assessment undermines the statutory process and precludes informed decision-making.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations to assess effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance and the presence of deficiencies and omissions in the submitted evidence conflict with the legal and policy framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met by the application, as there is a clear absence of evidence showing that the specific needs and concerns of island communities have been adequately assessed or integrated into the planning rationale.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' interests are a material consideration. However, the submitted documentation does not provide any substantive analysis or engagement outcomes that reflect these interests. This omission constitutes a significant procedural and evidential deficiency. Without such consideration, the proposal conflicts with the applicable legal and policy framework, undermining the statutory purpose of the Act.

Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are evident, these matters must weigh decisively against the granting of consent. In this case, the failure to properly consider and weigh island community interests is a fundamental flaw that renders the proposal unacceptable in planning terms. The application should therefore be refused on the basis that it does not satisfy the statutory requirements imposed by the Islands (Scotland) Act 2018.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. The evidential burden rests squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this burden, leaving critical gaps in the evidence base that prevent a clear and confident determination that the proposal accords with the full spectrum of legal and policy obligations.

Moreover, where compliance has not been demonstrated, or where the submitted evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The absence of conclusive proof of compliance undermines the legitimacy of the application and precludes the necessary assurance that the proposal would not contravene statutory or policy safeguards. On this basis, the application should be refused.

1.1.244 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal's failure to meet the impact criteria set out in NPF4 Policy 11 is that it cannot receive the policy's intended support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon compliance with specific impact tests designed to protect communities, landscapes, seascapes, and other sensitive receptors. The proposal, however, does not satisfy these conditions, thereby undermining its eligibility for policy backing.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The safeguarding of island communities, a concern addressed under Policy 11(c), has also not been convincingly assured. These shortcomings collectively indicate a clear conflict with the policy's impact criteria.

Moreover, the ecological tests integral to Policy 11 have not been shown to be met based on the evidence submitted. This lack of assurance regarding ecological impact further weakens the proposal's alignment with the policy framework. In summary, the proposal's failure to satisfy these critical impact requirements means it cannot legitimately benefit from the support that NPF4 Policy 11 offers for renewable energy projects.

When assessing the proposal against the relevant policies within NPF4, it becomes apparent that the necessary mitigation measures to prevent significant adverse effects on designated assets have not been satisfactorily demonstrated. Policy 11 must be considered alongside Policy 4(c) and 4(d), which afford protection to National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on the qualities for which these areas are designated. In addition, Policies 7(h), 7(c), and 7(d) specifically safeguard scheduled monuments, their settings, and other historic assets. Policy 3 further requires the protection of biodiversity. The evidence submitted fails to show that the proposal's impacts can be effectively mitigated to a degree that would comply with these interconnected policies, particularly in relation to the preservation of landscape qualities, heritage asset significance, and ecological integrity.

Moreover, the proposal falls short in demonstrating that it would safeguard island communities and their unique cultural and environmental contexts, which are fundamental considerations under these policies. The significant adverse effects anticipated on nationally designated landscapes and seascapes are not adequately addressed, nor has the cultural significance of scheduled monuments and their settings been convincingly protected. The ecological assessments submitted do not meet the requisite tests to confirm that biodiversity interests would be maintained or enhanced. Taken together, these shortcomings establish a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, thereby undermining the proposal's compliance with the national planning framework.

In comparing the proposed development to the existing terrestrial planning framework, it is apparent that the mitigation measures fail to address the

fundamental conflicts identified with the Argyll and Bute Local Development Plan 2. The proposal would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This failure to adequately mitigate impacts on land-based assets distinguishes the proposal from acceptable developments that align with the objectives of the Local Development Plan.

Consequently, the proposal is inconsistent with the development plan as a whole, including National Planning Framework 4. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with the relevant policies or that the adverse effects can be appropriately managed. On this basis, the proposal conflicts with the terrestrial development plan framework and should be refused.

1.1.245 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant's own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. Furthermore, the applicant's documentation acknowledges the influence of distance on judgements; for example, an assessment of a coastal area over 30 kilometres away concludes that the scale of change is small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes lie results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the effects the Scottish Ministers are being asked to consider.

The visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the stated 35-year operational lifespan. This change would be a novel feature in an environment that has, until now, been characterised by natural darkness, thereby affecting the visual experience of the area during night-time hours.

It is also noted that the 35-year operational period does not represent a limit on the potential harm in policy terms. The decision to grant consent for this development would effectively amount to a determination that this particular seascape is suitable for wind farm use. Such a decision carries significant weight, as it establishes a precedent regarding the acceptability of lighting effects and their impact on the character of the night-time environment.

In balancing these considerations, it is important to recognise the lasting implications of introducing permanent lighting into an unlit seascape, alongside the policy recognition that consent equates to suitability for wind farm development in this location. Any assessment of the proposal must therefore carefully weigh the visual and character impacts against the broader policy framework governing offshore wind farm siting.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.246 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's recognised approach—developed and refined through consultation with that body—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline

occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

The applicant's assessment acknowledges the cultural significance of the heritage assets primarily through qualities such as pilgrimage, arrival by sea, movement within a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape. Notably, these attributes are experienced through dynamic movement rather than static viewpoints. While this recognition is a positive step towards understanding the heritage value, the assessment may not fully capture the experiential qualities that contribute to the broader cultural landscape.

Historic Environment Scotland, in their consultation responses included within the application, highlighted this potential shortcoming by requesting additional viewpoints. Their concern was that the current assessment might inadequately represent these wider qualities, which are essential to appreciating the heritage assets in their full context. This suggests a need for a more comprehensive approach that goes beyond fixed observation points to encompass the cultural narratives conveyed through movement and the relationships between elements in the landscape.

Given the importance of these experiential and relational qualities, it is essential that the assessment methodology and any proposed mitigation measures reflect this complexity. Without a thorough representation of the cultural landscape's dynamic nature, there is a risk that the heritage impacts may be underestimated. Therefore, further consideration should be given to incorporating these wider qualities to ensure that the cultural significance of the affected assets is fully and appropriately addressed.

The heritage impact conclusions presented rely heavily on the landscape assessment as their foundation. However, where the landscape effects have been understated, as identified previously, the subsequent heritage conclusions inevitably reflect that same understatement. This dependency calls into question the robustness of the heritage impact findings.

In essence, the credibility of the heritage assessment is compromised by the deficiencies in the landscape evaluation. Without an accurate and comprehensive appraisal of landscape effects, the heritage conclusions derived are not sufficiently reliable to inform decision-making. Therefore, the current heritage impact conclusions should be treated with caution given their reliance on a flawed landscape assessment.

The application as submitted fails to comply with essential policy requirements designed to protect heritage assets, thereby undermining its acceptability. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which addresses scheduled monuments, along with Policies 7(c) and 7(d) concerning the setting of heritage assets. These policies are complemented by GEN 6 and

paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a robust framework for safeguarding the cultural significance of heritage assets of international and national importance.

Despite this clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be protected. Critically, the Scottish Ministers have not been presented with the necessary assessment that such a conclusion would require. Without this assessment, there can be no assurance that the development will respect or preserve the heritage values enshrined in these policies.

In conclusion, the failure to meet these key policy obligations in relation to heritage protection renders the application unacceptable in its current form. It is therefore recommended that the application be refused on these grounds unless and until a comprehensive and satisfactory assessment is provided.

1.1.247 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

The applicant's failure to assess the habitability of the affected islands has practical consequences for understanding and mitigating impacts on island communities. Although their consultants acknowledged habitability as a potentially significant pathway of effect, no place-based assessment was conducted for these islands. Instead, the socio-economic assessment in Chapter 18 focuses on regional analysis and detailed examination of port communities, concluding—without specific evidence—that island communities are of low sensitivity to tourism effects. This approach overlooks the unique nature of small island economies, which are not average regional economies but are heavily reliant on sectors vulnerable to changes in visitor appeal. Consequently, dependence on increasing visitor numbers intensifies their sensitivity rather than diminishing it. Therefore, the conclusion of low sensitivity lacks empirical support and rests on an unsubstantiated assumption rather than robust place-based analysis.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore,

NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.248 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and decommissioning activities into this sensitive environment over several decades presents a substantial risk of significant adverse environmental effects.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

The legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The applicant's submission fails to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal an insufficient degree of certainty that the legal requirements can be met, thereby undermining the protections afforded to these ecological features. Given this clear shortfall, the application does not fulfil the necessary legal criteria, and consent should therefore be withheld.

1.1.249 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the current approach to assessing the proposed project, as only a portion of it is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot function—have been deferred to separate, later applications. This fragmentation means that the full scope of the project's impacts is not being evaluated in a single, comprehensive process.

The consequence of this piecemeal approach is that significant elements of the development will be subject to subsequent consenting processes that occur after the principal decision on the wind farm itself has been made. Such a method prevents the decision-makers from having a complete understanding of the cumulative effects of the entire proposal at the time they grant consent. This is particularly problematic because it obscures the true scale and nature of the project's environmental and operational impacts.

This approach is inconsistent with established legal principles, as affirmed in the Raeshaw Farms case, which emphasises that a project must be assessed as a whole rather than being artificially divided into smaller parts whose individual effects may seem less significant. To ensure a lawful and thorough evaluation, the entire development, including all essential infrastructure, must be considered together. Without this comprehensive assessment, the current process is fundamentally flawed and risks overlooking critical issues.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

While mitigation measures have been proposed, they fail to address a fundamental procedural deficiency concerning project splitting and the assessment of cumulative effects. The applicant has not satisfactorily demonstrated compliance with GEN 21 and paragraph 4.85 of the National Marine Plan, nor with NPF4 Policy 11(e), all of which explicitly require comprehensive evaluation of cumulative and in-combination effects. Furthermore, the requirements of the Environmental Impact Assessment Regulations in relation to project splitting have not been met. This omission means that the cumulative impacts of the proposal and the overall effects of the project, including any deferred works, have not been reliably identified or assessed. It is therefore essential that the decision-making process explicitly considers the treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.250 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, an uncertainty that fundamentally challenges the legitimacy of the applicant’s case. The applicant requests that Scottish Ministers place significant weight on this process, yet the quality of public engagement throughout both the plan and site-selection stages has been demonstrably deficient. These shortcomings have persisted into the application stage itself, which is extensive and complex, comprising many thousands of pages of technical material. Crucially, the consultation period has coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is severely limited. This situation contrasts sharply with the applicant’s position, having had years to prepare and substantial professional and financial resources at its disposal.

The National Marine Plan, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by decisions of this scale must be afforded a realistic opportunity to engage. Regrettably, the conditions under which affected communities have been expected to respond fall short of these established standards. This shortfall undermines the fairness and inclusiveness that are essential to legitimate decision-making processes. It is imperative that Scottish Ministers recognise this deficiency and take it fully into account when considering the representations made.

In light of these concerns, it is clear that the consultation process has not met the requisite standards for effective public participation. This failure has compromised the integrity of the site-selection process and, by extension, the application as a whole. Therefore, the weight afforded to the site-selection process should be

carefully re-evaluated, with full acknowledgement of the limitations imposed on affected communities throughout the consultation period.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.251 Effects on Local Area

The practical consequence of the applicant’s underassessment is that the direct and significant effects on the communities of Islay, Colonsay, and Oronsay have not been properly recognised or addressed. Despite Islay and Colonsay being the closest inhabited islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application evaluates Islay primarily as a potential project site rather than as a community affected by proximity. This omission fails to consider the Atlantic-facing communities on Islay whose daily environment and economy are intimately connected to the nearby 448 square kilometre development area, leaving a critical gap in understanding the local impacts on their setting, economy, and social fabric.

For Colonsay and Oronsay, the situation is equally concerning. Their seaward outlook, which fundamentally shapes everyday life, directly faces the proposed development. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan. This area represents the clearest recognition within the application that harm to the internationally protected seabird populations of these

cliffs cannot be ruled out, yet the assessment does not adequately address the wider implications for the community and environment dependent on this designated site.

Further compounding the deficiencies in the heritage assessment is the presence of Oronsay Priory, a scheduled monument of national importance within this community's area. The assessment's identified gaps, particularly in relation to the treatment of the monument's open maritime setting, apply fully here and undermine confidence in the evaluation's reliability. Taken together, these shortcomings demonstrate a failure to comprehensively assess the environmental and heritage impacts on Islay, Colonsay, and Oronsay, thereby weakening the overall credibility of the application's impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and significant effects are accepted for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

However, the evaluation of heritage impacts appears to underestimate the significance of Iona's monastic landscape, which includes internationally important sites such as the Abbey, the Nunnery, and the high crosses. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape in understanding this heritage. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, potentially overlooking key experiential impacts.

Community concerns further underline the scale of the effects, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a landmark 141 metres high visible from Iona at approximately 33 kilometres; the largest turbines would exceed this height by approximately 194 metres at a closer distance of roughly two-thirds of that range. Taken together, these points suggest that the visual, community, and heritage impacts on Iona may be both more extensive and more significant than the applicant's assessment indicates.

The applicant's assessment of visual and community impacts on Mull and Ross of Mull coastal areas notably underestimates the significance of effects despite recognising some high sensitivities. While mitigation measures are acknowledged, they rely heavily on distance-based reasoning that inadequately addresses the experiential and economic consequences for local communities. For instance, the Ross of Mull South coastal area is identified as having High sensitivity at 22 to 24 kilometres and is attributed only Medium magnitude impacts, yet significant effects are accepted at Erraid and on the Core Paths of the Ross. Fionnphort, a key

gateway to Iona and the primary embarkation point for visitors, is acknowledged to be significantly affected, yet no place-based assessment has been undertaken for this community most directly tied to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, despite being of High sensitivity throughout at distances of approximately 21 to 33 kilometres, is assigned no more than Medium magnitude impacts. This approach is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's conclusion of a small scale of change due solely to viewing distances over 30 kilometres illustrates a reliance on quantitative distance rather than qualitative experience. Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers—depends on the largely unindustrialised Atlantic seascape that the development would fundamentally alter, yet none of these vital communities has received a tailored, place-based impact assessment. This collective inadequacy in addressing the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent populations represents a fundamental shortcoming in the applicant's assessment.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery. The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area at a distance of approximately 35 kilometres, this conclusion

appears inconsistent when contrasted with the inherently sensitive nature of Tiree's landscape. The area is correctly identified as having High sensitivity, yet the scale of the proposed turbines—up to 335 metres in height—would introduce vertical elements unprecedented in the island's seascape. Given that Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, reaching only 141 metres, the dominance of sea and sky fundamentally defines its landscape character. The introduction of turbines more than twice this height would significantly alter the open oceanic horizon that is central to Tiree's distinctive sense of place. Consequently, a Low magnitude of change understates the true extent of visual and landscape impact on such an exposed and sensitive receptor. Therefore, the applicant's evaluation cannot be regarded as a reliable reflection of the likely effects on Tiree's landscape character.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development area. For instance, the community-owned island of Gigha, celebrated nationally for its regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula, yet these important seaward panoramas are subject only to the distance-based moderation critiqued here. Moreover, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura and surrounding waters, alongside the Treshnish Isles and nearby mainland coasts, share this unassessed vulnerability. Consequently, the applicant's approach compromises the comprehensiveness of the assessment by omitting these key receptors, undermining confidence in its conclusions.

There remains considerable uncertainty regarding the applicant's methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant's approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.252 Personal Observations

In addition to the planning matters above, I am personally concerned because: We live, work and sail here. It would be a tragedy for the entire community and economy of West Coast of Scotland. Millions of tourists come here by land, sea and air to enjoy this incredible area.

Based on my own local knowledge, I also wish to highlight that: The local environment, landscape, wildlife and community is a jewel in Scotlands crown. Don't rip it out.

Finally, I would also ask the Scottish Ministers to consider: Do not poison this land.

1.1.253 Further Comments

You're the custodian of this ancient landscape. Do your jobs.

1.1.254 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant’s documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 126
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals under applications 00012385 and 00012386, seeking consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. These applications, lodged by MachairWind Limited (ScottishPower Renewables), relate to the development of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, within a designated Windfarm Development Area encompassing around 448 square kilometres of marine space. This area lies to the north-west of Islay and to the west of Colonsay, situated approximately 21 kilometres from Iona and in close proximity to several southern Hebridean islands and coastal communities.

I formally request that this letter be recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final determination concerning these applications.

The following exposition details the planning and environmental grounds for objection against the proposed development, framed within the relevant statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus of proof rests squarely on the applicant, who must provide sufficient and robust evidence to demonstrate compliance with all applicable tests. Conversely, objectors are not obligated to establish the contrary. Upon careful consideration of the evidence presented, it is evident that the applicant has failed to meet this burden. Accordingly, I contend that consent ought to be withheld.

1.1.255 Legislative and Policy Framework

The applicant’s submission in this case must be considered against the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is mandated to take reasonable steps to mitigate any adverse effects arising from the proposal on these identified interests. The Scottish Ministers, as the determining authority, are similarly required to have regard to these statutory duties in their decision-making process. This legal framework establishes a clear and non-negotiable obligation on both the applicant and the decision-maker to ensure that the proposal does not undermine these protected interests without adequate consideration and mitigation.

In this instance, the application fails to demonstrate compliance with these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s approach to preserving natural beauty and conserving the relevant ecological and heritage assets. There is a lack of sufficient detail or commitment to reasonable mitigation measures to address the adverse effects that the proposal

would inevitably cause. These shortcomings represent a direct conflict with the statutory requirements under Schedule 9 of the Electricity Act 1989. As such, these unresolved conflicts and evidential gaps weigh decisively against the granting of consent for the proposal. The application, therefore, does not meet the necessary legal standards and should be refused on this basis.

1.1.256 Conflict with National Planning Framework 4 and the Development Plan

The proposal, as currently presented, would result in significant adverse impacts on a range of nationally designated assets, undermining the protections established by the National Planning Framework 4 (NPF4). Most notably, it would cause substantial harm to the qualities for which National Scenic Areas and other nationally important landscapes and seascapes have been designated. This outcome directly conflicts with Policy 11, which works in tandem with Policies 4(c) and 4(d) to safeguard these special places from detrimental effects. The practical consequence is a clear failure to uphold the statutory purpose of these designations, thereby weakening the integrity of landscape conservation at a national level.

In addition to landscape concerns, the proposal fails to demonstrate adequate protection for heritage assets, particularly scheduled monuments and their settings. Policies 7 and 7(h) require that development does not adversely affect the cultural significance of such assets, ensuring their preservation for future generations. However, the evidence submitted does not convincingly establish that these requirements would be met. Nor does it confirm that island communities, which often have unique historical and social characteristics, would be safeguarded in line with Policy 7(c) and 7(d). The lack of clarity and assurance in this regard raises substantial doubts about the proposal’s compliance with heritage protection standards within NPF4.

Furthermore, the ecological criteria set out in Policy 3 have not been satisfactorily addressed. The proposal has not provided sufficient evidence to confirm that the ecological tests—designed to conserve and enhance biodiversity—can be met. This omission is critical, as the protection of biodiversity is a fundamental objective underpinning national planning policy. Taken together, these deficiencies demonstrate that the proposal is inconsistent with the comprehensive framework of NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity. Consequently, it should not be supported in its current form.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These detrimental effects undermine the purpose of the policies designed to protect the terrestrial environment and local character of the area. Consequently, the proposal fails to align with the objectives set out in the development plan framework relevant to land-based considerations.

This inconsistency extends beyond the local plan to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with or justifies departure from these strategic planning policies. As a result, the proposal stands in

clear conflict with the established planning policy framework at both local and national levels.

In light of these points, the proposal cannot be supported as it contradicts essential policy protections for the land-based environment within Argyll and Bute. The adverse effects identified and the lack of demonstrable compliance with the development plan justify refusal in accordance with established planning principles.

1.1.257 Seascape, Landscape and Visual Effects

The applicant's assessment methodology notably lacks a defined distance threshold beyond which major effects are considered to cease, as stated in Appendix 16.1. Nonetheless, an independently prepared Evidence Note, which rigorously analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change. This pattern persists irrespective of the receptor's intrinsic sensitivity or the extent of its visibility. Such a finding indicates that the methodology implicitly diminishes the potential severity of effects at distances exceeding 20 kilometres, thereby raising significant concerns about the reliability of the predicted impacts upon sensitive receptors at these ranges.

Further scrutiny of the applicant's own documentation underscores the influence of distance on these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the development site explicitly states that, given the viewing distance, the scale of change is judged to be small. Moreover, the Landscape Character synthesis delineates a gradation of effect magnitude with distance: High magnitude effects are identified within approximately 20 kilometres, Medium effects between about 20 and 30 kilometres, and Low effects beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances corresponding to the locations of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not reliably characterise the effects that the Scottish Ministers are asked to consent, thereby undermining the robustness and credibility of the applicant's assessment methodology.

When considering the impact of the proposed development on the night-time seascape, it is important to weigh the introduction of aviation and navigation lighting against existing conditions. Currently, the sea horizon remains unlit, contributing to the natural character of the area after dark. The proposed lighting would be a permanent addition for the duration of the project's 35-year operational life, fundamentally altering this aspect of the seascape.

While the operational timeframe may suggest a finite period of impact, this does not diminish the significance of the harm in planning terms. The decision to approve the development would effectively signify an acceptance that the seascape is appropriate for wind farm use, thereby setting a precedent for future changes to this previously unlit environment.

Therefore, any assessment of the development's effects must carefully consider the balance between the benefits of renewable energy infrastructure and the irreversible change to the night-time seascape character. This balance should inform policy decisions, ensuring that the visual and environmental qualities of the seascape are adequately protected or mitigated where possible.

There remains significant uncertainty regarding the proposal's compliance with the suite of relevant planning policies designed to safeguard nationally important landscapes and seascapes. The effects identified engage specific provisions of the National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that its assessment of the scale of these effects aligns with its own stated methodology. This lack of consistency undermines confidence in the conclusions reached and, consequently, in the assertion that the proposal adheres to the protections these policies afford. On this basis, it is concluded that the proposal does not comply with the key planning policies intended to protect the landscape and seascape interests at a national level.

1.1.258 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate that the integrity of setting for historic assets has been properly evaluated, undermining confidence in its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's established methodology—which mandates an evaluation of whether changes to setting affect its contribution to cultural significance and whether setting integrity is maintained—the assessment relies predominantly on descriptions of visual change rather than the required evaluative analysis. A Methodological Audit, conducted using the applicant's own Appendix 14.3, reveals that while heritage attributes are identified and factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation are discussed, the critical step of assessing the integrity of setting in accordance with the accepted methodology is absent. This omission means that the conclusion asserting adequate retention of setting integrity is unsupported by the necessary methodological rigor, calling into question the reliability of the applicant's heritage impact findings.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a range of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. However, Historic Environment Scotland, as recorded in the application's consultation responses, has identified that the assessment may not fully capture these broader experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its intangible values are properly represented. This suggests that the applicant's current assessment may inadequately reflect the holistic and lived experience of the heritage assets, which is critical to understanding their full cultural significance.

There remains significant uncertainty regarding the reliability of the heritage impact conclusions due to their dependence on the landscape assessment. As identified,

the landscape effects have been understated, which calls into question the robustness of the subsequent heritage conclusions derived from that assessment. This foundational issue introduces a degree of doubt that cannot be overlooked when considering the overall appraisal of the proposal's impacts.

Given that the heritage conclusions are intrinsically linked to the landscape assessment, any understatement in the latter inevitably leads to a corresponding understatement in the former. This interdependence weakens the credibility of the heritage impact evaluation and suggests that the conclusions presented may not fully reflect the true extent of the effects. Consequently, it is essential that this deficiency is addressed to ensure a more accurate and comprehensive understanding of the proposal's heritage implications.

1.1.259 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

1.1.260 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would involve large-scale construction, operational, and decommissioning activities extending over several decades, introducing sustained disturbance into this ecologically sensitive environment.

Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable. The long-term nature and scale of the development could disrupt key ecological functions, necessitating thorough assessment and mitigation to address the sensitivity of the site and its surrounding marine ecosystem.

When considering developments that may impact protected habitats, it is important to recognise that mitigation, compensation measures, and future monitoring plans, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike measures that may reduce or offset potential harm,

these proposals cannot substitute for the fundamental evidential standard required to demonstrate that a development will not adversely affect the integrity of a protected site. This distinction underscores the necessity for applicants to provide robust, conclusive evidence at the outset, rather than relying on subsequent interventions.

The legal framework governing such consent is exacting and unequivocal. Under the Habitats Regulations, consent may only be granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site. This high evidential threshold is non-negotiable unless the strict derogation tests are satisfied, which themselves impose rigorous conditions. The responsibility to demonstrate compliance with these statutory tests rests squarely with the applicant, emphasising that the burden of proof is both substantive and procedural.

This legal context is reinforced by related policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. These policies collectively affirm the imperative to protect marine and terrestrial habitats through careful planning decisions that adhere to statutory requirements. The cumulative effect of these legal and policy instruments ensures that development consent processes maintain a high standard of environmental protection, reflecting the critical importance of conserving biodiversity and ecosystem integrity.

The applicant’s own derogation documents, as submitted in support of the application, indicate a significant degree of uncertainty regarding the satisfaction of the statutory tests designed to protect internationally important habitats and species. The evidence clearly shows that the applicant has not provided sufficient assurance that these legal requirements will be met. This lack of demonstrable compliance raises serious concerns about the potential for harm to ecological features of international significance.

Given the paramount importance of these statutory protections, the failure to establish that the tests can be satisfied fundamentally undermines the justification for granting consent. Without clear evidence that the legal thresholds have been met, approval of the application would be inconsistent with the obligation to safeguard internationally important ecological assets. Therefore, the application should be refused on the grounds of non-compliance with the requisite statutory environmental safeguards.

1.1.261 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

1.1.262 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process's legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

1.1.263 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant's assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—

subject to the applicant's derogation case and compensation plan. This represents a clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

There remains significant uncertainty regarding the applicant's assessment of the visual, community, and heritage impacts on Iona, which appears to underestimate both their scale and significance. The Coastal Character assessment clearly identifies the Sound of Iona as an area of High sensitivity, with direct orientation towards the development, extensive visibility, and a Large geographical extent of change. The overall effect is described as Moderate and Significant across approximately 21 kilometres, with turbines spanning some 39 degrees of the horizon. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at its highest point, Dùn Ì.

Iona's monastic landscape, encompassing the Abbey, Nunnery, and high crosses, holds heritage of international importance. The applicant's own baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape as key aspects. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on the community—this has never been adequately assessed.

To put the scale of the visual impact into perspective, the largest turbines would exceed the height of Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres. The turbines would overtop Ben Hynish by roughly 194 metres at a closer distance of around two-thirds of that range, underscoring the significant visual intrusion. Taken together, these factors demonstrate that the applicant's evaluation lacks the necessary accuracy and comprehensiveness, thereby compromising the reliability of the environmental and social impact conclusions for Iona.

1.1.264 Personal Observations

Based on my own local knowledge, I also wish to highlight that: This will be a huge detriment to wildlife

Finally, I would also ask the Scottish Ministers to consider: Why does 'green' energy have to be so detrimental to our beautiful environment.

1.1.265 Further Comments

No

1.1.266 Summary

The proposal fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. Its own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. Furthermore, published analyses of the applicant's documents reveal a consistent underestimation of the scale of these impacts. Crucially, the required heritage assessment has not been completed. Impacts on the island communities affected by the development were identified but have not been subjected to any formal assessment. Additionally, the ecological requirements have not been satisfactorily demonstrated as achievable. It is also important to note that only a portion of the project is currently under consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, along with the related marine licence application.

Should the Ministers be inclined not to refuse outright, I request that they require the submission of further environmental information and enhanced visual representations. Moreover, I recommend that the applications be determined only following a public inquiry, thereby allowing for comprehensive examination of the issues raised in this objection. Irrespective of the outcome, I further request that the Ministers explicitly address and provide clear conclusions in their decision documentation regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 127
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, brought forward by MachairWind Limited (ScottishPower Renewables), relate to the construction and operation of an offshore wind energy development with an installed capacity of approximately 2 gigawatts. The project envisages between 91 and 144 turbines, each reaching a blade tip height of up to 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This area lies north-west of Islay, west of Colonsay, and approximately 21 kilometres from Iona, placing it in close proximity to the southern Hebridean islands and their coastal communities.

In accordance with procedural expectations, I request that this correspondence be formally registered as an objection, that I be recognised as an objector, and that I receive notification of the determination of these applications. The grounds for objection are founded on both planning and environmental considerations, framed by the relevant statutory and policy contexts governing such developments. It is essential to emphasise that the responsibility lies entirely with the applicant to provide robust and sufficient evidence demonstrating compliance with all applicable regulatory tests. Objectors bear no obligation to substantiate contrary claims.

Upon thorough examination of the submissions and supporting evidence, it is evident that the applicant has failed to meet the requisite standards to justify approval. Consequently, for the reasons elaborated herein, I submit that consent should be withheld.

1.1.267 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as detailed in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nonetheless, analysis derived from the applicant’s Chapter 16 and associated appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. This implicit distance influence is further evidenced by assessments of coastal areas over 30 kilometres away, where the scale of change is explicitly judged to be small due to viewing distance, and by the Landscape Character synthesis, which categorises magnitude as High within about 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond roughly 30 kilometres for certain landscape types.

Such an approach results in protective assessments being based on systematically moderated inputs at distances coinciding with the location of the most sensitive designated landscapes. Consequently, the conclusions presented do not reliably represent the true effects the Scottish Ministers are requested to consider. The absence of an explicit distance threshold in the methodology undermines the

accuracy and robustness of predicted effects, raising significant concerns about the integrity of the assessment outcomes.

The applicant's visual evidence is prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

There remains significant uncertainty regarding the assessment of the proposal's effects on landscape and seascape interests. The applicant has failed to adequately demonstrate that its conclusions on the scale of these effects align with the methodology it has employed. This raises questions about the reliability of the impact evaluation and undermines confidence in the overall assessment.

Moreover, this lack of clarity has direct implications for compliance with established planning policies. The proposal does not satisfy the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, all of which are designed to safeguard nationally important landscapes and seascapes. Without clear evidence of adherence to these policies, the proposal cannot be considered consistent with the statutory framework protecting these valued environments.

1.1.268 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach necessitates more than a description of visual changes. It requires a thorough evaluation of whether alterations to setting affect the contribution that setting makes to the cultural significance of the asset, and crucially, whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be directly equated with adverse impact.

A published Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not demonstrate how the integrity of setting has been evaluated in accordance with the applicant's own adopted methodology. The assessment focuses on describing visual elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains intact. However, the essential evaluative step required by the methodology—demonstrating how these visual factors influence the cultural significance and integrity of setting—is absent in all the examined worked examples. This omission calls into question the robustness of the assessment's findings.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. It recognises the importance of relationships between monuments, spirituality, and the surrounding landscape and seascape, all of which are experienced dynamically rather than through fixed viewpoints. This nuanced understanding underscores that heritage value extends beyond isolated features to encompass experiential and spatial dimensions that contribute to the overall cultural landscape.

Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that the applicant's assessment may not adequately capture these broader qualities. They specifically requested the inclusion of additional viewpoints to ensure a fuller representation of the cultural landscape's experiential aspects. This indicates a potential shortfall in the baseline assessment and suggests that the heritage impact appraisal may underestimate effects on the wider cultural and experiential context. Consequently, the assessment should be revisited to incorporate these broader perspectives, thereby providing a more comprehensive understanding of heritage impacts.

The heritage impact conclusions presented in the proposal are closely linked to the findings of the accompanying landscape assessment. It is important to consider that any mitigation measures proposed rely fundamentally on the accuracy and comprehensiveness of the landscape evaluation. When landscape effects are minimised or understated, as has been identified, the proposed mitigation may not adequately address the full scope of potential harm.

This reliance raises significant concerns because the heritage conclusions effectively inherit the deficiencies present in the landscape assessment. If the latter underestimates the visual or environmental impacts, the resulting heritage assessment will similarly understate the potential adverse effects on historic assets. This interconnectedness means that any shortcomings in landscape evaluation directly undermine the credibility of the heritage impact findings.

Accordingly, the robustness of the overall assessment is compromised by this dependence. Without a fully accurate and transparent landscape analysis, the conclusions regarding heritage impacts cannot be regarded as reliable. It follows that the planning authority should carefully scrutinise these linked assessments to ensure that any mitigation measures are grounded in a comprehensive understanding of the true effects.

The application falls short in providing adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, the applicant has not supplied the necessary assessments or evidence demonstrating that these values will be safeguarded. This absence of detailed evaluation contrasts unfavourably with the expectations of comprehensive heritage protection embedded within the relevant policy framework.

In addition, the application does not align with the provisions of GEN 6 nor paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the need for rigorous protection of heritage assets within marine planning contexts. Given that the Scottish Ministers lack before them any conclusive assessment addressing these concerns, the proposal fails to meet key policy requirements. Consequently, the application cannot be considered acceptable in respect of heritage asset protection.

1.1.269 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence is fundamentally motivated by the qualities identified in the applicant’s own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the primary attractions drawing visitors to the area, forming the cornerstone of the local economy.

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The practical consequence of the applicant’s flawed socio-economic assessment methodology is a significant risk that the specific impacts on island communities will be misunderstood and inadequately mitigated. The applicant’s consultants

themselves identified habitability as a potentially significant pathway for effects on these communities, yet no targeted assessment of island habitability was conducted. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, detailed only for port communities, and fails to provide an equivalent place-based assessment for the islands directly facing the proposed development. Despite this omission, the assessment concludes that island communities exhibit low sensitivity to tourism effects, a conclusion unsupported by detailed evidence.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Their economic structures are heavily concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers amplifies dependence on these critical qualities, which are precisely those at risk from the proposed development. Therefore, any assertion of low sensitivity to tourism impacts, made without detailed, place-specific analysis, constitutes an unsubstantiated assumption rather than a reasoned conclusion.

Given these shortcomings, the socio-economic assessment fails to provide a robust basis for understanding or addressing the specific vulnerabilities of island communities. Without proper, place-based analysis, the potential socio-economic consequences for these communities remain unclear and inadequately accounted for within the planning process. Accordingly, the application should be reconsidered to ensure that the assessment methodology appropriately reflects the unique sensitivities of island economies and supports effective mitigation strategies.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal’s effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal’s compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system’s requirements to safeguard island communities effectively.

1.1.270 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, indicating a site of high ecological value. Additionally, the surrounding waters serve as a habitat for diverse species including seabirds, marine mammals, and basking

sharks. This evidence underscores the presence of sensitive and protected species within and around the proposed development site.

Introducing large-scale construction, operational, and decommissioning activities into such an ecologically important environment over several decades raises significant concerns. The scale and duration of these activities have the potential to cause substantial adverse environmental effects, threatening the integrity of the Priority Marine Features and the habitats of the protected species identified. Careful consideration of these factors is essential to fully assess the environmental implications of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

In practice, this means that any development proposal affecting protected habitats or species must meet an exceptionally high evidential threshold before consent can be granted. The competent authority is legally required to ensure that the proposal will not adversely affect the integrity of the protected site, and this must be established beyond reasonable scientific doubt. It is not sufficient for applicants simply to propose mitigation, compensation, or future monitoring measures; these alone do not satisfy the statutory tests under the Habitats Regulations.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these regulations and policies establish a stringent consent regime that places the burden of proof firmly on the applicant to demonstrate compliance. Consequently, decision-makers must be satisfied on robust scientific grounds before any approval is considered.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the

statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.271 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The cumulative impact assessments presented rely fundamentally on the conclusions drawn in other sections of the Environmental Impact Assessment. These underlying assessments of landscape, heritage, and socio-economic effects form the baseline from which cumulative impacts are evaluated. However, as previously demonstrated, these baseline assessments understate the true extent of the effects in each category.

Because the cumulative assessment is built upon these understated baselines, it inherently starts from a reduced point of reference. This methodological approach means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are likely to be significantly underestimated. The cumulative impact, therefore, does not accurately reflect the true scale or significance of the combined developments.

Given this reliance on flawed baseline assessments, the cumulative effects assessment cannot be regarded as reliable. It fails to provide a robust or comprehensive understanding of the overall impact, which calls into question the validity of the conclusions drawn regarding the proposal's cumulative environmental and socio-economic consequences.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of

the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.272 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty surrounding the adequacy of public participation in the site-selection process, which the applicant urges the Scottish Ministers to weigh heavily. The quality of engagement at both the plan and site-selection stages exhibits notable deficiencies that have persisted into the current application phase. Given the extensive volume of technical documentation—comprising many thousands of pages—and the timing of the consultation during the island communities' busiest months, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited, the opportunity for meaningful participation has been severely constrained. This contrasts starkly with the applicant's prolonged preparation period and substantial professional and financial resources.

The importance of effective public participation in decisions of this scale is underscored by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention. These require that those affected are afforded a realistic opportunity to contribute to the decision-making process. Unfortunately, the circumstances under which the local communities have been expected to respond fall short of these established standards.

In light of these concerns, it is essential that the Scottish Ministers give careful consideration to the limitations of the consultation process when evaluating the representations submitted. The legitimacy of the site-selection process depends significantly on ensuring that public participation is both meaningful and accessible, and this has not been demonstrably achieved in the present case.

The Environmental Impact Assessment (EIA) submitted with this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, it fails to adequately investigate identified pathways to significant effects. For instance, the landscape assessment applies a distance pattern not supported by its own methodology, the heritage assessment does not demonstrate adherence to its integrity test, and the socio-economic assessment lacks a place-based analysis of the affected islands. These deficiencies undermine the reliability of the conclusions reached.

Furthermore, the application depends in part on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties. However, reliance on these measures does not satisfy the EIA Regulations, which require that likely significant effects be understood and clearly evidenced prior to determination. Deferring resolution of key issues until after consent would be contrary to statutory requirements.

In light of these matters, the Scottish Ministers must base their decision solely on the evidence presently before them. The applicant has not demonstrated that the

environmental information submitted is adequate for that purpose. Therefore, the application should not be approved in its current form.

1.1.273 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which border the development's closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to adequately address the significant and direct effects on these island communities and their heritage.

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual, economic, and community impacts on Mull and the Ross of Mull coastal areas. The Ross of Mull South coastal area, identified as of High sensitivity at distances of approximately 22 to 24 kilometres, is attributed only a Medium magnitude of effect. This is despite the applicant's acceptance of significant effects at Erraid, on the Core Paths of the Ross, and notably at Fionnphort—the gateway to Iona and critical embarkation point for visitors—where the community is directly tied to tourism flows. Similarly, across Mull, significant effects are acknowledged on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands and recognised as of High sensitivity at 21 to 33 kilometres, is nonetheless assessed at no more than Medium magnitude. This approach fails to fully reflect the cumulative and place-specific nature of the impacts.

Moreover, the applicant's reliance on distance as a primary determinant, exemplified by the treatment of the Wilderness and Gribun Rocks coastal area—where effects are judged small due to viewing distances exceeding 30 kilometres—demonstrates a simplistic methodology that inadequately captures the scale and character of change experienced locally. The applicant does not provide a place-based assessment for communities whose economies and identities are intimately linked to the Atlantic seascape, such as those dependent on tourism, wildlife boat operations, and accommodation in Mull's western townships. The proposed development's industrialising effect on this seascape is therefore insufficiently recognised, leaving a critical gap in understanding the broader community and economic consequences. It is essential that these factors be fully addressed to ensure a balanced and accurate evaluation of the project's impacts.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and

undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, while attributing a Low magnitude of change to the proposed development. However, this evaluation appears to significantly understate the likely effects on Tiree's landscape character. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, creating an open oceanic horizon that is both sensitive and distinctive. The introduction of turbines up to 335 metres in height would introduce vertical structures unprecedented in this seascape, thereby altering its defining characteristics in a manner not adequately reflected by a Low magnitude rating. Given the exposed nature of Tiree and the prominence such turbines would have within its visual context, the conclusion of Low magnitude does not reliably represent the scale of change anticipated. Consequently, the assessment's evaluation of effects on Tiree's sensitive landscape is insufficiently robust and requires reconsideration to accurately reflect the magnitude of impact.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. For instance, Gigha, a community-owned island celebrated nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. The omission of any examination of impacts on Gigha's closely balanced community and economy undermines the thoroughness of the assessment. Similarly, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development share this direct relationship with the seascape, yet their interests have been overlooked.

Moreover, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These high-quality seaward panoramas are precisely the type of receptors for which the applicant's distance-based moderation has been applied in this objection. By disregarding these communities and their economic and visual connections to the seascape, the assessment compromises its comprehensiveness and fails to address key receptors that would experience significant effects. This omission weakens the credibility of the applicant's conclusions and highlights the need for a more inclusive and detailed evaluation of all affected communities.

The applicant’s assessment systematically moderates and discounts the magnitude of change affecting highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of environmental effects on these receptors, as the assessment reduces the perceived significance of impacts solely based on distance. Such a methodology fails to account adequately for the true extent of change experienced by these communities.

Consequently, the effect on populations living beyond this arbitrary threshold remains insufficiently evaluated. These communities, which bear the consequences of the development, have received no place-based assessment to reflect their specific circumstances and sensitivities. This omission undermines the thoroughness and accuracy expected in a robust environmental impact assessment.

In summary, the applicant’s distance-based approach compromises the integrity of the assessment by systematically discounting effects beyond 20 kilometres without proper justification. For the assessment to be comprehensive and reliable, it must address the significant impacts on all sensitive receptors irrespective of distance, ensuring that all affected communities are properly considered.

1.1.274 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant’s documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities involved were identified, no comprehensive assessment of these impacts has been undertaken. Furthermore, the ecological criteria pertinent to the proposal have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently submitted for Ministerial consideration.

In light of these substantial shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence.

Should the Ministers consider proceeding without refusal, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the applications be determined only following a public inquiry, thereby allowing the issues raised in this objection to be thoroughly examined. Regardless of the decision reached, I further request that the Ministers provide clear conclusions within their reasons specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 128
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), must be considered with this letter as a registered objection, and I request to be informed of the final determination.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area encompassing some 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the southern Hebridean islands and their coastal communities.

My objection is grounded in planning and environmental considerations, assessed against the statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide adequate and compelling evidence demonstrating compliance with all relevant tests and requirements. Objectors bear no obligation to prove the contrary. Having carefully examined the submissions, I conclude that MachairWind Limited has not met this evidential burden. Consequently, the applications should be refused consent.

1.1.275 Conflict with National Planning Framework 4 and the Development Plan

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important

landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

1.1.276 Seascape, Landscape and Visual Effects

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.277 Cultural Landscape, Archaeology and Historic Environment

The applicant's submission fails to demonstrate compliance with key heritage protection policies, notably NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the cultural significance of internationally and nationally important heritage assets and their settings has not been adequately assessed or shown to be protected. Consequently, the Scottish Ministers do not have before them the necessary assessment to support a conclusion that these heritage assets would be safeguarded, undermining the acceptability of the application.

1.1.278 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not merely incidental; they constitute the core appeal that sustains the visitor economy upon which these communities depend to an exceptional degree.

Any alterations to these fundamental qualities would therefore have a direct and detrimental impact on the economic foundation of the island communities. Such an impact would extend beyond economics, threatening local services, population

stability, and ultimately the long-term viability of these communities. The proposal, by undermining the very characteristics that attract visitors, poses a significant risk to the social and economic sustainability of the islands.

1.1.279 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

1.1.280 Cumulative and In-Combination Effects

The applicant's submission fails to meet the mitigation requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), particularly regarding the assessment of cumulative and in-combination effects. Unlike the standards expected under the EIA Regulations to prevent project splitting, the proposal does not provide a reliable identification or comprehensive assessment of the project's overall environmental impact. This omission undermines the ability to compare the mitigation measures effectively and assess their adequacy in addressing the full scale of potential effects.

Furthermore, the application does not explicitly consider the implications of deferred works within its assessment, which is essential for a robust determination. Without a clear and thorough evaluation of these deferred components, the decision-making process lacks a complete understanding of the project's cumulative environmental consequences. It is therefore requested that the treatment of deferred works be expressly addressed to ensure full compliance with planning policies and regulatory requirements before any approval is granted.

1.1.281 Public Engagement, Site Selection and Environmental Information

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment

fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.282 Effects on Local Area

The applicant's assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the closest inhabited areas to the proposed development, which lies immediately north-west of Islay and west of Colonsay. Despite this proximity, the application primarily considers Islay in terms of its potential as a project location rather than as an affected community. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment is provided to evaluate how their setting, economic activities, or community life might be impacted. For Colonsay and Oronsay, the situation is similarly concerning. The seaward outlook, fundamental to daily life on these islands, faces the development directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is internationally protected for its seabird population, and the application itself acknowledges that harm to this population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's area, yet the heritage assessment fails to properly consider the impact on its open maritime setting. In sum, the applicant's underassessment of effects on Islay, Colonsay, and Oronsay results in a deficient appraisal of environmental and heritage impacts, calling into question the credibility of the application's conclusions.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant across approximately 21 kilometres, where turbines would span around 39 degrees of the horizon. Similarly,

the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes significant effects upon residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts, particularly regarding the island's internationally important monastic heritage. The baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing—has not been fully addressed. Notably, no visualisation has been provided from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point integral to appreciating the heritage context.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect without subsequently undertaking an assessment of this impact. The scale of the turbines is also understated; for instance, Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—would be surpassed in height by the largest turbines by about 194 metres, despite the turbines being located at roughly two-thirds of that distance.

In summary, while the applicant recognises certain significant effects on Iona, the overall evaluation falls short in fully capturing the extent and depth of visual, community, and heritage impacts. This underestimation compromises the accuracy and reliability of the environmental and social impact appraisal for the island.

When considering the applicant's assessment in relation to the effects on Mull and the Ross of Mull coastal communities and landscapes, it is important first to compare the proposed mitigation measures against the scale and nature of the impacts identified. The assessment acknowledges significant effects at key locations such as Erraid and along the Core Paths of the Ross of Mull South coastal area, which is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors, is accepted by the applicant as experiencing significant effects. This community is intrinsically connected to the visitor flows, underscoring the potential for substantial socio-economic consequences.

Extending across Mull, the applicant also accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is consistently assessed as having High sensitivity at viewing distances ranging from approximately 21 to 33 kilometres. However, the applicant attributes no more than a Medium magnitude to the impacts here, which may understate the true significance given the area's national scenic importance.

The approach taken towards the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Despite the acknowledged viewing distance of over 30 kilometres, the applicant judges the scale of change to be small, relying primarily on

distance-based reasoning. This method, as outlined in the applicant's own terms, risks overlooking the qualitative aspects of visual and experiential impact that extend beyond mere separation distance.

Crucially, the west-facing tourism economy of Mull, including its wildlife boat operations and the accommodation sectors in its western townships, is deeply dependent on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet none of these communities has been afforded a detailed, place-based assessment within the applicant's documentation. This omission limits the understanding of the potential adverse effects on communities whose livelihoods are closely tied to the natural environment and visitor experience.

In conclusion, while the applicant recognises some significant effects, the reliance on distance as a primary determinant and the attribution of only Medium magnitude in areas of acknowledged High sensitivity suggest that the assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull. The lack of detailed, place-specific evaluation for key tourism-dependent communities further compounds this shortfall. Therefore, the assessment as presented inadequately addresses the significant effects on these sensitive coastal landscapes and their associated communities.

The applicant's assessment fails to consider significant effects on multiple mainland and island communities directly facing the development site, thereby undermining the comprehensiveness and reliability of the environmental appraisal. Gigha, a community-owned island emblematic of island regeneration, looks eastward towards the proposed development, yet the impact on its delicate social and economic equilibrium remains entirely unexamined. Likewise, Ardnamurchan Point—the westernmost tip of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors to this peninsula. These seaward vistas represent precisely the type of sensitive receptors dismissed through the applicant's reliance on distance-based impact moderation. Furthermore, the western Kintyre coast encompasses a series of communities whose identity, outlook, and tourism economy are intrinsically linked to the open Atlantic seascape facing Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coastal areas sharing views towards the development site are similarly disregarded in the assessment. This pattern of omission demonstrates a fundamental shortfall in the applicant's evaluation process, as it neglects key receptors with direct visual and economic connections to the seascape. In conclusion, the failure to assess these effects compromises the integrity of the environmental appraisal and weakens the basis upon which informed planning decisions can be made.

1.1.283 Personal Observations

In addition to the planning matters above, I am personally concerned because: I absolutely Love Iona, Mull and all the otehr Islands. It will greatly affect all those Islands and the Families living there. Tourism will be down as I do not want to look at Turbines and lights in the Night and they destroy the Seabed and all living creatures in the Sea. There are too many of tehses things in and around Scotland

Based on my own local knowledge, I also wish to highlight that: The effect on the Sealife, the effect on the Sea and Wind directions. The effect on the families taht live onb the Islands,e specially the concerning the Infrasound

Finally, I would also ask the Scottish Ministers to consider: Scottland has enough WIndturbines as it is. Why are you destroying teh landscape, the Sea, and all that for foreing Companies, For Companies taht will profit and your OWN PEOPLE will loose out. I do not understand you

1.1.284 Further Comments

Check the new finds that Windturbines affect the Sea, teh currebnt, the wind more aas you ever expected. You are destroying one of the most Beautiful Countries on this Planet

1.1.285 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, independent reviews of the applicant’s documentation reveal that these impacts have been understated. Furthermore, a comprehensive heritage assessment, as mandated, has not been undertaken. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been conducted. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. Compounding these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the related marine licence. Should the Ministers be disinclined to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Moreover, the decision-making process should be deferred until after a public inquiry, thereby allowing thorough scrutiny of the concerns raised in this objection. Irrespective of the final determination, it is further requested that the Scottish Ministers articulate explicit conclusions within their reasons, particularly addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 129
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. It comprises between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within an extensive Windfarm Development Area covering about 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded on planning and environmental considerations addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the responsibility to satisfy the relevant legal and policy tests rests entirely with the applicant, who must provide sufficient evidence to demonstrate compliance. Objectors are not obligated to prove the contrary. In this instance, the applicant has failed to meet this evidential burden, and accordingly, I contend that consent for the development should be withheld.

I request that this communication be formally recognised as an objection, that my status as an objector be recorded, and that I be kept informed of the final decision regarding these applications.

1.1.286 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure means that the proposal does not adequately address the legal obligations imposed on both the applicant and the Scottish Ministers in the determination process.

Furthermore, the applicant has not shown that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. The absence of such mitigation measures constitutes a significant omission and undermines the statutory requirement to minimise harm to the environment and heritage assets. This deficiency directly conflicts with the legal and policy framework governing the assessment of such developments.

Given these shortcomings, the application does not meet the necessary statutory criteria, and the evidence identifies clear conflicts with the applicable legal duties. As

a result, these matters weigh decisively against the granting of consent for the proposal under Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies that are critical to the assessment process, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating adherence to these policies undermines the statutory assessment and indicates that the proposal does not meet the necessary legal and policy standards.

In particular, the application exhibits deficiencies and omissions that conflict with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 and paragraph 4.81 is a significant shortcoming, as it impedes a robust evaluation of potential impacts. Moreover, the lack of adequate engagement as mandated by GEN 18 raises concerns about the thoroughness and transparency of the consultation process. The cumulative impacts, which must be assessed in accordance with GEN 21 and paragraph 4.85, have not been satisfactorily addressed, leaving uncertainty regarding the broader environmental consequences of the proposal. These gaps in the application's evidence base and procedural compliance weigh heavily against the granting of consent.

Given these material deficiencies and the clear conflicts with the statutory and policy framework, the marine licence application cannot be considered compliant with the requirements of the Marine (Scotland) Act 2010 and the National Marine Plan. The absence of demonstrated compliance with key General Policies, combined with the evidential shortcomings and procedural defects identified, justifies refusal of the application. It is essential that authorisation decisions uphold the integrity of the statutory assessment process by refusing consent where compliance has not been established.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, natural environments, historic assets, and the sustainable use of energy in development proposals.

However, the evidence demonstrates that the proposal fails to comply with these critical policies. There is no satisfactory demonstration of compliance with Policy 3 regarding biodiversity; the application lacks adequate assessment or mitigation measures to ensure the protection or enhancement of biodiversity interests. Similarly, under Policy 4, the proposal does not sufficiently address the conservation

or enhancement of natural places, resulting in a failure to meet the policy's requirements for safeguarding natural environments.

Regarding Policy 7, the proposal does not provide the necessary evidence to confirm that historic assets and places will be preserved or appropriately managed. The absence of a thorough heritage impact assessment or mitigation strategy indicates a conflict with the statutory duties to protect historic assets. Finally, with respect to Policy 11 on energy, the application does not demonstrate compliance with the policy's requirements for sustainable energy use or energy efficiency, nor does it provide evidence of alignment with relevant legislative standards.

Where compliance has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh against the granting of consent. Given the proposal's failure to meet the requirements of Policies 3, 4, 7, and 11 of NPF4, it is clear that the application does not accord with the national planning framework and associated statutory duties.

In conclusion, the proposal's non-compliance with key policies of National Planning Framework 4 concerning biodiversity, natural places, historic assets, and energy constitutes a significant planning objection. The deficiencies and omissions identified in the applicant's evidence justify refusal of consent in accordance with the applicable legal and policy framework.

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal's environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, yet the application documentation does not provide sufficient evidence that these interests have been adequately assessed or integrated into the planning rationale.

Furthermore, the absence of a thorough evaluation of the proposal's impact on island communities constitutes a significant omission. The lack of such consideration conflicts directly with the legal and policy framework established by the Islands

(Scotland) Act 2018. As established in the approved evidence, where compliance has not been demonstrated or where deficiencies and omissions exist, these factors must weigh against the granting of consent.

In light of these deficiencies, the proposal cannot be regarded as meeting the statutory requirements to protect and promote the interests of island communities. The failure to properly consider these interests undermines the integrity of the decision-making process and provides a clear basis for objection to the granting of planning permission.

The practical consequence of the applicant's failure to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements is that the application cannot be lawfully approved. The evidential burden rests squarely on the applicant to prove that every applicable legal and policy framework has been satisfied. Without such demonstration, the decision-maker is left without the necessary assurance that the proposal meets the comprehensive standards set by legislation and policy.

The submitted evidence does not establish that the applicant has fulfilled this responsibility. There are clear deficiencies and omissions in the documentation provided, and no conclusive proof has been presented to confirm adherence to all statutory and policy obligations. This absence of demonstrable compliance undermines the integrity of the application and directly conflicts with the established legal and planning framework. As a result, the application fails to meet the fundamental requirements for lawful consent.

Given these shortcomings, the application must be refused. The failure to demonstrate compliance with the full suite of legal and policy requirements is a decisive factor that weighs heavily against granting consent. It is incumbent upon the determining authority to uphold the statutory and policy safeguards by rejecting proposals that do not meet the evidential standards necessary to confirm lawful and policy-compliant development.

1.1.287 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to meet the impact criteria outlined in NPF4 Policy 11, which explicitly supports renewable energy development only insofar as it complies with specified protections. Notably, Policy 11(c) requires safeguarding communities from adverse effects, while Policies 11(d) and 11(e) impose strict controls to prevent unacceptable impacts on landscape, seascape, and other sensitive receptors. The evidence demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, thereby breaching these critical provisions.

Furthermore, the submission does not satisfactorily address the protection of cultural heritage or community interests. The cultural significance of scheduled monuments and their settings remains unprotected, and the proposal fails to provide sufficient assurance that island communities would be safeguarded from detrimental impacts. In addition, the ecological assessments fall short of demonstrating that the necessary environmental tests can be met. Taken together, these shortcomings

establish clear conflicts with the impact criteria of NPF4 Policy 11, undermining the policy's conditional support for the development in question.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

The applicant has not provided evidence to demonstrate that the proposed development incorporates sufficient mitigation to address the adverse effects identified in relation to the terrestrial environment. In comparison to the protections afforded by the Argyll and Bute Local Development Plan 2, the proposal fails to safeguard the landscape, heritage, and community interests that these policies explicitly seek to preserve. This lack of adequate mitigation results in a clear discordance between the development and the established local policy framework.

Consequently, the proposal stands in direct conflict with the relevant provisions of the development plan, as well as with the overarching objectives set out in National Planning Framework 4 when considered in its entirety. Given the absence of compelling justification or effective mitigation measures, the proposal does not align with the statutory planning framework and should be regarded as inconsistent with the terrestrial development plan policies that are material to land-based effects.

1.1.288 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, relying solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern across all three assessment streams. This pattern shows that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation directly stems from the applicant's own documents, which acknowledge the influence of distance on their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis within the applicant's materials describes a High magnitude of

effect within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond around 30 kilometres for some landscape types.

This approach has significant implications for the reliability of the assessment's conclusions. By systematically moderating magnitude at distances where some of the most sensitive designated landscapes are located, the protective tests applied rely on understated input values. Consequently, the conclusions drawn do not provide a robust or accurate description of the effects upon which Scottish Ministers are being asked to base their consent decisions. This methodological limitation undermines the assessment's capacity to fully capture and convey the potential landscape and visual impacts at critical receptor locations beyond the stated distance thresholds.

While mitigation measures are presented as part of the proposal to address visual impacts, it is important to recognise the inherent limitations of the visualisation materials used to support the assessment. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully replicate the scale perceived by a viewer in the actual field setting. Furthermore, wireline drawings included within the same panoramic projections are constrained by the same photographic limitations; they serve as technical renderings embedded within the visualisation rather than functioning as independent or corrective representations. Consequently, reliance on these materials may underestimate or misrepresent the true visual effects experienced on site, and this constraint should be carefully considered in the evaluation of the proposed development's impact.

While mitigation measures may address some visual impacts of offshore development, the introduction of aviation and navigation lighting presents a distinct and permanent alteration to the night-time seascape character. Currently, the sea horizon remains unlit, and the proposed lighting would irrevocably change this condition for the entire 35-year operational lifespan of the project. Importantly, this operational timeframe does not limit the extent of harm in planning terms; consenting to the development effectively designates this seascape as appropriate for wind farm use, with all attendant changes to its character. Such a fundamental shift requires careful consideration given the significance of preserving the existing unlit marine environment at night.

The proposal's acknowledged effects engage multiple key planning policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is no clear evidence that the proposal complies with policies designed to protect nationally important landscapes and seascapes. In light of this, it is evident that the proposal does not meet the necessary policy requirements safeguarding these valued environmental interests.

1.1.289 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage

impacts. Although the applicant adopts Historic Environment Scotland's recognised approach—developed and refined through consultation with that body—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

While the applicant has sought to mitigate heritage impacts through various measures, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that underpin the significance of the affected assets. The applicant's own baseline acknowledges that the heritage significance is not confined to discrete monuments or static views but is deeply rooted in dynamic qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This understanding underscores the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced through movement rather than from fixed viewpoints.

In this context, the applicant's assessment may not fully capture the extent of these wider cultural qualities. Historic Environment Scotland, in their consultation responses documented within the application, requested additional viewpoints to ensure that these experiential and landscape relationships are properly represented. This suggests that the initial assessment might have been limited in scope, potentially overlooking key aspects of cultural significance that contribute to the heritage assets' value.

Therefore, while mitigation efforts are acknowledged, there remains a concern that without a comprehensive representation of these broader cultural and experiential elements, the heritage impact assessment risks underestimating the true significance of the site. It would be prudent for the assessment to incorporate these wider perspectives to inform more effective and sensitive heritage protection measures.

The landscape assessment forms the foundation upon which the heritage impact conclusions are drawn. When the landscape effects are understated, as has been demonstrated, any heritage conclusions that rely on that assessment inevitably

adopt the same understatement. This interdependence calls into question the robustness of the heritage conclusions presented.

Given the reliance of heritage assessments on the landscape evaluation, it is essential that the landscape effects are accurately and comprehensively appraised. Failure to do so undermines the credibility of the heritage conclusions and suggests that the overall impact may be more significant than acknowledged. Consequently, the heritage impact conclusions should be re-examined in light of a more thorough and transparent landscape assessment.

The practical consequence of the current application is that it fails to provide the necessary assurance that important heritage assets will be adequately protected. This shortcoming directly undermines the proposal's acceptability, as the applicant has not supplied the required evidence to demonstrate that the cultural significance of heritage assets of international and national importance, as well as their settings, will be preserved. Without such demonstration, decision-makers cannot confidently conclude that the development complies with relevant heritage protection policies.

This deficiency engages a number of critical policy provisions. Specifically, the proposal falls short of the requirements set out in NPF4 Policy 7(h), which relates to scheduled monuments, and Policies 7(c) and 7(d), which concern the setting of heritage assets. In addition, it contravenes GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies and guidance collectively demand robust assessment and clear evidence that development will not harm the integrity or significance of designated heritage sites and their surroundings.

Given the absence of a comprehensive assessment and the failure to demonstrate compliance with these key policies, the Scottish Ministers do not have before them the necessary information to approve the application. The lack of evidence to protect heritage assets represents a fundamental policy conflict that cannot be overlooked. Consequently, the application should be refused on the grounds of insufficient heritage protection, in line with the established statutory and policy framework.

1.1.290 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities identified: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not incidental but form the core attraction sustaining the local visitor economy. The proposed development threatens to alter these very qualities, thereby undermining the fundamental reasons why visitors choose to come.

Any diminution of these key characteristics would have a direct and adverse impact on the economic foundations of these communities. This, in turn, would jeopardise the provision of local services, reduce population stability, and ultimately threaten the long-term social and economic viability of the islands. The proposal therefore poses a significant risk to the continued sustainability of these communities by damaging the essential qualities upon which they depend.

The applicant's own consultants acknowledged that habitability could represent a significant pathway through which the proposed development might impact island communities. Despite this recognition, no specific assessment of the habitability of the islands likely to be affected was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, providing detailed consideration of potential port communities but neglecting a comparable, place-based examination of the island communities facing the development. Notwithstanding this omission, the assessment asserts that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without the necessary granular analysis.

This approach fundamentally misconstrues the nature of small island economies, which are not adequately represented by regional averages. Such economies tend to be concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Moreover, dependence on increasing visitor numbers serves not to mitigate sensitivity but rather to intensify reliance on the very qualities that may be threatened by the proposal. Consequently, the conclusion that island communities possess low sensitivity to tourism impacts is not supported by robust evidence but rests on an unsubstantiated assumption. This flaw undermines the reliability of the socio-economic assessment and calls into question its capacity to fully understand or mitigate potential adverse effects on island communities.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it neglects the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, it does not adhere to NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and appropriately weighted through meaningful engagement from the outset to the conclusion of the planning process.

Crucially, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the potential effects of the proposal on these communities. This omission represents a significant shortcoming in demonstrating that the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities have been fulfilled.

In conclusion, given the lack of adequate assessment and meaningful engagement with island communities as required by relevant policies and statutory frameworks, the proposal does not meet established planning and legal standards. Therefore, it cannot be considered compliant with the requirements designed to protect and support sustainable island communities.

1.1.291 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over a

period of several decades. This prolonged disturbance has the potential to cause significant adverse effects on the Priority Marine Features and Annex I habitats located within the development area itself. Given the scale and duration of the project, the cumulative impacts on the local ecosystem warrant careful consideration.

The surrounding waters of the site are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for essential life processes such as feeding, breeding, and migration. Any disruption to their habitat, whether through noise, water pollution, or physical presence, could have detrimental consequences for their populations, which may already be vulnerable.

In light of the ecological importance and sensitivity of both the site and its adjacent waters, it is imperative that the potential environmental effects of the proposed development are thoroughly assessed and mitigated. Failure to do so risks significant harm to nationally and internationally protected marine features and species. Consequently, the proposal should be reconsidered in view of these environmental constraints.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area, particularly concerning the guillemot population. These documents are specifically prepared for circumstances where it cannot be definitively ruled out that the development would harm the protected site. Their inclusion in the application therefore signals that the applicant recognises the possibility that the proposed development may have significant environmental impacts requiring mitigation.

Importantly, the submission of these derogation and compensation documents serves a procedural and substantive function within the planning process. It indicates that the applicant has sought to comply with the necessary legal and policy frameworks governing protected sites, by proposing measures intended to address and offset any potential harm. However, this does not represent a definitive conclusion on the absence of adverse effects. On the applicant's own approach, there remains scope for the Scottish Ministers to reach a differing view regarding the likelihood or extent of any impacts on site integrity, which may influence the ultimate determination of the application.

In light of this, while the submission of these documents demonstrates an awareness and preliminary attempt to manage environmental risks, it also underscores the unresolved nature of the assessment of effects on the protected guillemot population. The application must therefore be carefully scrutinised to ensure that any potential adverse effects are fully considered and that any proposed compensation measures are robust, proportionate, and deliverable. Only through such a thorough approach can appropriate protection of the Special Protection Area be secured in accordance with planning policy and statutory obligations.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely

affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed to approval. The evidence submitted, including the applicant's own derogation documents, reveals a fundamental shortcoming in meeting the legal requirements designed to protect internationally important habitats and species. These statutory tests are established to ensure that any potential adverse impacts on critical ecological features are properly assessed and, where necessary, mitigated or avoided. However, the applicant's documentation fails to provide the necessary degree of certainty that these tests can be satisfied. Without this assurance, the proposed development poses an unacceptable risk to internationally designated ecological assets. Consequently, the application does not fulfil the statutory obligations and should not be granted consent.

1.1.292 Public Engagement, Site Selection and Environmental Information

The applicant's submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant's advantage, having had years to prepare the case with considerable professional and financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such

magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The Environmental Impact Assessment submitted with this application is fundamentally insufficient to enable the Scottish Ministers to reach a fully informed decision. While the assessment covers a range of topics, it falls short of providing a comprehensive and reliable evidential basis. Notably, significant effects identified within the application are either inadequately investigated or assessed using methodologies that lack coherence and rigour. For instance, the landscape assessment produces outcomes based on a distance pattern not supported by its stated methodology; the heritage assessment fails to apply its own integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. These deficiencies undermine the credibility of the assessment's conclusions.

Furthermore, the application frequently relies on future measures such as post-consent plans, monitoring programmes, and additional approvals to address gaps in the environmental information. However, such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood before determination. The expectation that outstanding matters will be resolved at a later stage does not satisfy the statutory requirement for a complete and sufficient assessment at the time of decision-making.

In light of these considerations, the Scottish Ministers are compelled to determine the application solely on the evidence presently before them. Given that the applicant has not demonstrated the adequacy of the environmental information submitted, the assessment cannot be regarded as sufficient to support approval. It is therefore concluded that the Environmental Impact Assessment is inadequate for the purpose of this decision, and the application should not be granted consent on the basis of the current information.

1.1.293 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant's assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—

subject to the applicant's derogation case and compensation plan. This represents a clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

The applicant's assessment recognises significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is rated as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—being identified as the community most directly affected by changes to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas are acknowledged. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity across distances ranging from approximately 21 to 33 kilometres, though the applicant attributes this only a Medium magnitude of effect.

However, the applicant's reliance on viewing distance as a primary determinant of impact magnitude results in a notably limited appraisal of certain areas. For example, the Wilderness and Gribun Rocks coastal area is judged to experience a small scale of change due to its viewing distance exceeding 30 kilometres, reflecting a distance-based reasoning that fails to capture the true extent of impact. Crucially, the assessment does not provide place-based evaluations for Mull's west-facing tourism economy, wildlife boat operations, or the accommodation sectors of its western townships, all of which depend intrinsically on the Atlantic seascape that the proposed development would industrialise. This omission neglects the significant visual, economic, and community effects on these tourism-dependent communities and their surrounding designated landscapes, undermining the comprehensiveness of the applicant's impact assessment.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery.

The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant's assessment notably omits consideration of Gigha, a community-owned island that has become a national emblem of island regeneration following its purchase by local residents. Positioned to the east of the proposed development, Gigha's community and economy are delicately balanced and closely tied to the surrounding waters, yet no evaluation of potential impacts on this sensitive island has been provided.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers sweeping panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the type of visual receptor that the applicant's distance-based moderation approach seeks to diminish, raising concerns that important effects on this key viewpoint have been underestimated or overlooked.

Moreover, the chain of communities along the west coast of Kintyre depends heavily on the character and visitor economy shaped by the open Atlantic seaboard, encompassing views towards Islay, Jura, and beyond. The Treshnish Isles and neighbouring small islands and mainland coasts with direct sightlines to the development site share this intrinsic connection to the seascape, yet their potential exposure and economic reliance have not been adequately assessed. This lack of comprehensive evaluation compromises the robustness of the applicant's overall seascape and socio-economic impact appraisal.

The applicant's approach to assessing environmental effects employs a systematic moderation and discounting of impacts on sensitive receptors located beyond approximately 20 kilometres, resulting in a significant underestimation of those effects. Taken together, the evidence demonstrates a clear pattern: wherever a highly sensitive receptor lies beyond this threshold, the magnitude of change is artificially reduced and the resultant effect is correspondingly diminished. Crucially, this approach fails to provide any place-based assessment for the communities

experiencing these impacts, effectively overlooking their exposure and the significance of the effects upon them. Such a methodology undermines the integrity of the environmental impact assessment by neglecting the genuine extent and severity of impacts beyond the 20-kilometre boundary.

1.1.294 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes as well as on the heritage and communities of the coastal area in question. However, analyses derived from the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been completed, and although the effects on the island communities affected by the development were identified, they have not been subject to proper evaluation. Furthermore, the project has not satisfactorily met the required ecological tests. It is also important to note that only a portion of the project currently lies before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers decide against refusal, I request that they require the submission of additional environmental information alongside enhanced visual representations. Moreover, I recommend that the determination of these applications be deferred until after a public inquiry, thereby allowing thorough examination of the objections raised.

Regardless of the final decision, I further request that the Scottish Ministers provide explicit conclusions within their reasoning, specifically addressing the impacts on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 130
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) concerning the MachairWind Offshore Wind Farm, which is the subject of application numbers 00012385 and 00012386. Application 00012385 requests consent under section 36 of the Electricity Act 1989, while application 00012386 seeks a marine licence in accordance with Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be treated officially as an objection, that I be recorded as an objector, and that I receive notification of the decisions reached on these applications.

The proposed development involves establishing an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would comprise between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to the blade tip. The site encompasses a Windfarm Development Area of around 448 square kilometres, situated north-west of the Isle of Islay and west of Colonsay. Its location is roughly 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the planning and environmental grounds supporting my objection. These considerations are framed within the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to provide adequate evidence demonstrating that all relevant statutory tests and policy requirements have been met. Those opposing the development are not obliged to establish contrary proof. In this instance, the applicant has failed to meet this evidential burden, and for the reasons detailed below, consent ought to be refused.

1.1.295 Seascape, Landscape and Visual Effects

The proposal fails to demonstrate adequate mitigation in comparison to the requirements set out in relevant planning policies protecting landscape and seascape interests. The applicant has not shown that its assessment of the scale of the accepted effects aligns with its own methodology, thereby undermining the reliability of its conclusions. As a result, the proposal does not comply with National Planning Framework 4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), or GEN 7, nor does it meet the standards outlined in paragraph 4.28 of the National Marine Plan. This shortfall indicates a failure to safeguard nationally important landscapes and seascapes as mandated by these policies. Consequently, the proposal does not accord with the necessary policy framework and should not be supported.

1.1.296 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This methodology, developed through consultation with Historic Environment Scotland, mandates an evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset and whether the integrity of that setting is adequately retained. Crucially, it clarifies that visual change alone should

not be directly equated with adverse impact, emphasising a need for a considered evaluative approach beyond mere description of visibility or visual intrusion.

However, a Methodological Audit prepared in support of community objections, relying solely on the applicant's Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment focuses predominantly on describing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting is adequately retained. This critical evaluative step required by the methodology is not evidenced in any of the detailed examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is undermined by the absence of a transparent and rigorous application of the prescribed assessment process.

1.1.297 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal exhibit an exceptional dependence on visitors, whose arrival is principally motivated by the very qualities identified within the applicant's baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the core attractions that underpin the local tourism economy. Any alteration to these intrinsic qualities is therefore not merely an aesthetic or environmental concern but represents a direct threat to the fundamental economic structure of these communities.

The economic base supported by visitor expenditure sustains local services, underpins population retention, and ensures the ongoing viability of these island settlements. Disruption or degradation of the key qualities that attract visitors will have cascading effects, undermining service provision and jeopardising the social fabric and long-term sustainability of the islands. Thus, the proposal, by impacting these critical attributes, endangers the essential economic and social resilience of these communities.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than

reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

There remains significant uncertainty regarding the proposal's compliance with the statutory and policy requirements designed to protect island communities. The National Marine Plan, specifically GEN 19 and paragraph 4.81, alongside NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, establish a clear expectation that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. These provisions explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process. The absence of sound socio-economic data and the lack of a precautionary approach call into question the reliability of the proposal's assessment in this regard.

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.298 Ecology, Biodiversity and Habitats Regulations

The proposed development would result in construction, operation, and decommissioning activities at a very large scale, persisting for decades within an area that includes Priority Marine Features and Annex I habitats. These ecologically sensitive sites are located not only within the development footprint but also extend into the surrounding waters, which are known to support important populations of seabirds, marine mammals, and basking sharks. Given the recognised ecological importance and vulnerability of these habitats and species, the proposal carries a significant risk of adverse environmental effects. This context necessitates a thorough assessment of potential impacts and careful consideration of mitigation measures to safeguard the integrity of these protected marine environments.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan reflects an acknowledgement of the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically targeting the guillemot population. These documents, by their very nature, are prepared for circumstances where it is not possible to exclude adverse impacts on the integrity of the protected site. Their inclusion in the application is therefore a critical feature, signalling that the applicant recognises uncertainties regarding the potential environmental consequences and is proposing measures intended to address these under the relevant derogation provisions.

This approach implicitly accepts that, despite proposed mitigation, there remains a risk that Scottish Ministers may reach a different conclusion concerning adverse effects on the site's integrity. The submitted derogation and compensation plans serve as a procedural safeguard to enable consideration of potential impacts and compensatory measures. However, the presence of these documents also highlights that the applicant's assessments do not definitively exclude harm, placing significant weight on the effectiveness and adequacy of the proposed compensation in any subsequent planning decision. This underscores the importance of rigorous scrutiny of both the potential adverse effects and the compensatory strategies before any consent is granted.

The applicant must recognise that under the Habitats Regulations, consent for development affecting protected habitats can only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This standard is exacting, requiring that no reasonable scientific doubt remains. It is the applicant's responsibility to demonstrate this, and reliance solely on mitigation, compensation measures, or future monitoring does not satisfy the statutory tests. This legal framework is stringent and non-negotiable, ensuring the highest level of protection for designated sites.

This statutory requirement is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e) and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions establish a comprehensive policy context that upholds the rigorous protections of the Habitats Regulations. Any proposal must therefore be assessed with great care to ensure full compliance with both legal and policy standards before consent can be lawfully granted.

The applicant's own derogation documents, as submitted in support of the application, indicate a significant degree of uncertainty regarding the satisfaction of the statutory tests designed to protect internationally important habitats and species. The evidence clearly shows that the applicant has not provided sufficient assurance that these legal requirements will be met. This lack of demonstrable compliance raises serious concerns about the potential for harm to ecological features of international significance.

Given the paramount importance of these statutory protections, the failure to establish that the tests can be satisfied fundamentally undermines the justification for granting consent. Without clear evidence that the legal thresholds have been met, approval of the application would be inconsistent with the obligation to safeguard internationally important ecological assets. Therefore, the application should be refused on the grounds of non-compliance with the requisite statutory environmental safeguards.

1.1.299 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development

area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island's setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect at approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline identifies pilgrimage, sea arrival, and movement through the landscape as central to this significance. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself; however, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the cultural context.

A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community—a factor that remains unassessed. To further contextualise the scale of the impact, the turbines would exceed the height of Ben Hynish on Tiree (141 metres high and visible from Iona at approximately 33 kilometres) by about 194 metres, despite being situated roughly two-thirds of that distance away.

Taken together, these points demonstrate that the applicant's assessment underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the proposed development significantly underestimates the practical consequences for the coastal communities and landscapes of Mull and the Ross of Mull, particularly in relation to their tourism economies and designated scenic areas. For example, Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors, is recognised by the applicant as experiencing significant effects. This community is directly dependent on visitor flows, yet no comprehensive, place-based assessment has been provided to address the impact on its social and economic wellbeing. Similarly, the Core Paths of the Ross of Mull and areas such as Erraid are acknowledged to be significantly affected, yet these impacts are not fully accounted for in terms of their implications for local residents and visitors alike.

Across Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres. Despite this, the magnitude of impact is only rated as Medium, a conclusion that appears inconsistent with the recognised importance of this landscape. The applicant's reliance on distance-based criteria to diminish the perceived scale of change, as seen in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further exemplifies the inadequacy of the assessment. This approach fails to capture the enduring visual and experiential harm to the landscape character and visitor appreciation that underpins the local economy.

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers in the western townships, fundamentally depends on the intactness and natural quality of the Atlantic seascape. The proposed development would industrialise this environment, yet none of these communities has been subject to a detailed, place-specific evaluation of the consequential effects. This omission undermines confidence that the applicant has fully understood or mitigated the potential for significant adverse impacts on a vital part of Mull's economy and community identity. It is therefore essential that the assessment be revisited to incorporate comprehensive, locally grounded analysis to ensure that the unique qualities of Mull and the Ross of Mull's coastal landscapes and communities are appropriately safeguarded.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment concludes that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, exhibits a High sensitivity yet is attributed only a Low magnitude of change. This evaluation leads to a practical consequence whereby the impact upon Tiree's landscape character is materially underestimated, compromising the reliability of the overall effects assessment. The designation of Low magnitude fails to reflect the scale and prominence of the development as perceived from this sensitive receptor.

Tiree is an exceptionally low-lying island characterised by an open oceanic horizon and a landscape defined primarily by the dominance of sea and sky. Its highest elevation, Ben Hynish, rises to merely 141 metres, which emphasises the island's distinctive flat and expansive character. The introduction of turbines reaching up to 335 metres in height would constitute vertical elements of unprecedented scale within this seascape. Such structures would significantly alter the visual and experiential qualities that define Tiree's landscape, yet the assessment's Low magnitude rating does not adequately acknowledge this fundamental alteration.

In light of these considerations, the applicant's evaluation significantly understates the magnitude of change and its impact on Tiree's sensitive and distinctive landscape character. This understatement results in an unreliable appraisal of effects that fails to properly inform decision-making regarding the acceptability of the development's landscape and visual impacts. Accordingly, the assessment should be revisited to ensure a more accurate and proportionate recognition of the effects upon Tiree's unique seascape.

The applicant's assessment has not adequately addressed the significant effects of the proposed development on mainland and island communities with direct visual and economic connections to the seascape. For example, Gigha—a community-owned island celebrated as a national emblem of island regeneration—faces the development waters from the east. The potential impacts on its carefully balanced community and economy remain unexamined, representing a notable omission in the applicant's evaluation. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the types of receptors for which the applicant's distance-based moderation approach is applied, raising concerns about the adequacy of the assessment in capturing their significance.

Further, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands, alongside mainland coasts with views of the development area, share this position of reliance on the seascape. Despite this, the applicant's assessment appears to have overlooked these receptors, undermining the comprehensiveness of the environmental and socio-economic evaluation. Such gaps in the analysis risk compromising the robustness of the decision-making process and warrant thorough reconsideration to ensure that all affected communities are properly accounted for.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.300 Personal Observations

Based on my own local knowledge, I also wish to highlight that: No

1.1.301 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes as well as on the coastal communities and their heritage. Moreover, published analyses of the applicant's documents reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted. The identified effects on the impacted island communities remain unassessed, and the ecological criteria required by law have not been demonstrated as achievable. Additionally, the Scottish Ministers are only being asked to consider a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse the consent sought for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers consider granting consent, it is further requested that additional environmental information and enhanced visual representations be provided. Furthermore, the applications ought to be determined only after the holding of a public inquiry, allowing for a thorough examination of the concerns raised in this objection.

Regardless of the outcome, it is also requested that the Ministers explicitly address and document their conclusions regarding the effects on cultural heritage and the island communities affected by the proposal within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 131
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that my status as an objector be acknowledged, and that I receive notification of the final determination regarding these applications.

The project in question envisages the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site encompasses a Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and west of Colonsay. It lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The forthcoming sections detail the planning and environmental grounds for objection, framed within the statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus lies entirely with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy criteria are met. Objectors are not required to substantiate contrary claims. Upon examination of the evidence submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for the proposed development should be refused.

1.1.302 Seascape, Landscape and Visual Effects

There is a fundamental uncertainty regarding the applicant’s assessment methodology, particularly in relation to how distance thresholds are treated. Notably, the written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and its appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or visibility.

Further examination of the applicant’s own documents underscores the influence distance has on their judgements. For instance, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This demonstrates a clear, though implicit, distance-related grading of impact severity.

The implication of this approach is that the protective tests required by Scottish Ministers are being applied to inputs that are systematically understated. When magnitude is moderated precisely at distances where the most sensitive designated landscapes are located, the resulting conclusions cannot be regarded as a reliable description of the effects for which consent is sought. This raises significant concerns about the robustness and accuracy of the assessment on which the decision-making process depends.

The applicant has relied upon NatureScot's visualisation guidance in preparing the visual evidence for the assessment. This guidance explicitly recognises that printed visualisations are inherently limited in their ability to replicate the true scale perceived by a viewer in the field. Furthermore, wireline drawings, which are presented alongside panoramic photographic projections, share the same limitations as the photographs they accompany. These drawings serve as technical renderings within the visualisation and do not function as independent tools to correct or enhance the photographic depiction.

Such technical and perceptual limitations underline the challenges in fully conveying the visual impact of a development through printed materials alone. While the visualisations provide a useful indication, they cannot substitute for the actual experience of viewing the site in situ, where scale and context are understood more comprehensively. Consequently, reliance solely on these visual materials should be approached with caution when assessing the proposal's visual effects.

While mitigation measures may address certain visual impacts, the introduction of aviation and navigation lighting to a previously unlit sea horizon represents a fundamental and permanent alteration to the night-time seascape character for the full 35-year operational period of the development. This change is not merely a temporary or reversible effect; rather, it signifies a lasting transformation that, in policy terms, confirms the seascape's suitability for wind farm use. Consequently, consenting to this development entails accepting this enduring impact on the night-time seascape environment.

The applicant's proposals fail to demonstrate adequate mitigation in relation to the significant effects identified on nationally important landscapes and seascapes. While some measures have been suggested, these are insufficient when assessed against the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The absence of robust mitigation measures undermines confidence that the proposal can appropriately safeguard the visual and environmental qualities these policies seek to protect.

Furthermore, the applicant has not substantiated that its conclusions regarding the scale of the accepted effects align with the methodology employed in its own assessments. This lack of consistency raises serious concerns about the reliability of the environmental impact evaluation and, by extension, the proposal's compliance with key planning policies aimed at conserving nationally important landscape and seascape interests. In light of these shortcomings, the proposal does not meet the necessary policy standards and should not be supported.

1.1.303 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's established methodology for evaluating effects on the setting of historic assets, which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant's Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant's conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The practical consequence of the deficiencies in the landscape assessment is that the heritage impact conclusions lack reliability. Specifically, the heritage conclusions are contingent upon the landscape assessment; therefore, any understatement of landscape effects directly leads to a corresponding understatement in the heritage impacts derived from them. This dependency means that the credibility of the heritage assessment is fundamentally compromised by the initial shortcomings in evaluating the landscape effects.

There remains significant uncertainty regarding the application's compliance with key heritage protection policies. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the settings

of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for safeguarding the cultural significance of heritage assets and their surroundings.

Despite this policy context, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, the Scottish Ministers have not been provided with the requisite assessment to support such a conclusion. In light of this absence of essential evidence, the application cannot be considered acceptable in terms of heritage protection.

1.1.304 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors who are attracted specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any changes to these defining attributes will strike directly at the economic foundation of these communities. This impact extends beyond immediate visitor numbers to undermine essential local services, reduce population stability, and jeopardise the long-term viability of the islands themselves.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed examination of potential port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Notwithstanding this absence, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects. This approach fails to address the particular circumstances of the islands and thereby undermines the reliability of the conclusions drawn.

Small island economies cannot be accurately represented as regional averages, given that their economic structures are often concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers intensifies reliance on these qualities, which are precisely those at risk from the proposed development. Therefore, the assertion of low sensitivity to tourism impacts, reached without any place-specific analysis, is unfounded and amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw in the applicant's socio-economic assessment methodology calls into question its adequacy in understanding or mitigating the effects on island communities.

The applicant acknowledges that island communities require particular scrutiny in the planning process. However, the assessment undertaken falls short of the necessary standard to understand the proposal's effects on these communities. This deficiency is significant given the requirements set out in GEN 19 and paragraph 4.81 of the

National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite these explicit requirements, the applicant has failed to demonstrate that the proposal is compatible with the sustainability of island communities, nor has it evidenced that the statutory duties owed to them have been fulfilled. The lack of meaningful engagement and comprehensive assessment undermines the ability to ensure that the development will not adversely affect these communities. Consequently, the proposal does not comply with the necessary planning policies and statutory obligations designed to protect the social and economic wellbeing of island populations.

1.1.305 Ecology, Biodiversity and Habitats Regulations

The development area is of considerable ecological significance, encompassing Priority Marine Features and Annex I habitats within its boundaries. Furthermore, the adjacent waters provide habitat for a range of protected species, including seabirds, marine mammals, and basking sharks. This concentration of sensitive marine biodiversity underlines the environmental importance of the site and its surroundings.

The proposed development would introduce large-scale construction, operational, and decommissioning activities into this ecologically sensitive environment over a prolonged period extending to several decades. Such extensive and sustained disturbance carries the potential for significant adverse environmental effects, raising concerns about the long-term impacts on the Priority Marine Features and the protected species dependent on these habitats. Careful consideration of these factors is essential in the assessment of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents represent recognised mechanisms intended to address potential adverse impacts on protected sites when it cannot be conclusively ruled out that the proposal would maintain site integrity. Their inclusion signals the applicant’s awareness of possible significant effects and a preparedness to implement measures in line with derogation provisions.

It is important to understand that such submissions are typically prepared for situations where adverse effects on the integrity of a protected site are uncertain or likely. The presence of these documents within the application is a critical feature, as it highlights that the applicant does not categorically exclude the possibility of harm. This is a prudent step intended to facilitate regulatory consideration and possible mitigation, reflecting an approach that accounts for ecological sensitivities and the need for compensatory action.

Nevertheless, the applicant acknowledges that Scottish Ministers may arrive at a different conclusion regarding adverse effects than the applicant's own assessment. This recognition underscores that the submitted derogation and compensation documents serve as precautionary and responsive measures rather than definitive proof of no impact. In this context, the documents form a necessary part of the application's overall environmental evaluation, contributing to informed decision-making about the proposal's acceptability and the adequacy of proposed mitigation.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

The applicant has failed to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species. This conclusion is drawn from a thorough examination of the submitted evidence, including the applicant's own derogation documents, which collectively reveal a lack of sufficient certainty that these legal requirements can be met. Without clear satisfaction of these tests, the application does not fulfil the necessary legal criteria to justify consent. Consequently, in light of this demonstrable shortfall, the case for granting planning permission is fundamentally undermined and must be refused.

1.1.306 Cumulative and In-Combination Effects

There is significant uncertainty surrounding the current assessment approach for the proposed development, arising from the fact that only a portion of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—without which the wind farm cannot function—have been deferred to subsequent applications. This fragmentation means that the full

range of impacts associated with the entire project are never evaluated concurrently, leaving a considerable gap in the understanding of its cumulative effects.

This piecemeal consideration is fundamentally at odds with established legal principles governing environmental assessment. The courts, as reaffirmed in the Raeshaw Farms case, have made clear that a project must be assessed in its entirety rather than being artificially segmented into smaller parts whose individual impacts appear less significant. By deferring key components of the development, the current process effectively circumvents comprehensive scrutiny, undermining the integrity of the decision-making framework.

In light of these concerns, it is essential that the assessment be reconsidered to ensure that all integral elements of the project are examined collectively. Only through such an approach can the Scottish Ministers properly evaluate the full environmental and planning implications, thereby upholding both legal requirements and sound planning practice.

The practical consequence of relying on the current cumulative impact assessment is that the true combined effects of the proposed development alongside existing, consented, and foreseeable projects are significantly underestimated. This has important implications for decision-makers who depend on accurate evaluations to fully understand potential environmental and socio-economic consequences. An understated baseline leads directly to an understated cumulative impact, which risks overlooking meaningful harm that may arise from the aggregate of developments in the area.

This problem arises because the cumulative assessments draw upon conclusions established elsewhere in the Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have already minimized or failed to fully capture the extent of effects, the cumulative assessment necessarily begins from this flawed baseline. As a result, the combined effects are not properly accounted for, reducing the reliability of the overall assessment and weakening the evidential basis for planning decisions.

In light of this, the cumulative impact assessment cannot be considered a robust or trustworthy reflection of the likely combined effects of development in the locality. A more rigorous and comprehensive baseline evaluation is essential to ensure that cumulative assessments accurately reflect reality. Without this, the planning process risks proceeding on an incomplete understanding of potential impacts, which may lead to inadequate mitigation measures or inappropriate approval of proposals.

While mitigation measures have been proposed, they fail to address a fundamental procedural deficiency concerning project splitting and the assessment of cumulative effects. The applicant has not satisfactorily demonstrated compliance with GEN 21 and paragraph 4.85 of the National Marine Plan, nor with NPF4 Policy 11(e), all of which explicitly require comprehensive evaluation of cumulative and in-combination effects. Furthermore, the requirements of the Environmental Impact Assessment Regulations in relation to project splitting have not been met. This omission means that the cumulative impacts of the proposal and the overall effects of the project, including any deferred works, have not been reliably identified or assessed. It is

therefore essential that the decision-making process explicitly considers the treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.307 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty regarding whether the consultation process associated with this application has met the required standards of effective public participation, thereby raising concerns about the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place considerable weight on the site-selection process; however, this depends fundamentally on the quality of public engagement throughout. Evidence indicates that deficiencies in participation at both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months of the year for island communities, when residents are fully occupied by the visitor season and specialist advice is least accessible. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case. Moreover, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that affected communities must have a realistic opportunity to engage in decisions of this scale. The conditions under which these communities have been expected to respond fall short of this standard. Ministers are therefore respectfully urged to bear this firmly in mind when considering the representations made.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy is questionable, as it identifies potential pathways to significant effects but fails to investigate them thoroughly. For example, the landscape assessment employs a methodology that does not align with the outcomes presented, notably applying a distance pattern not supported by its own framework. Similarly, the heritage assessment lacks demonstration of its own integrity test’s application, and the socio-economic assessment omits a place-based analysis of the islands affected. These methodological shortcomings undermine the reliability of the conclusions drawn.

Moreover, the reliance on future assessment, post-consent plans, monitoring, and additional approvals does not satisfy the requirements of the Environmental Impact Assessment Regulations, which stipulate that likely significant effects must be understood before determination. The Scottish Ministers are compelled to decide based on the evidence currently available, rather than on the expectation that unresolved issues will be addressed satisfactorily at a later stage. The applicant has not demonstrated that the environmental information provided is adequate for informed decision-making, and as such, the application should not be approved in its present form.

1.1.308 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as

the closest communities directly affected. Despite this proximity, the applicant's assessment notably underrepresents the impacts on Islay, treating it primarily as a potential project site rather than recognising the island's own communities whose Atlantic-facing settlements confront the nearest edge of the development. This approach omits a place-based evaluation of the effects on Islay's setting, local economy, and community life. Similarly, Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the array, face direct consequences. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly regarding the evaluation of its open maritime setting. Taken together, these omissions undermine the reliability of the environmental and heritage impact evaluation for these island communities.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the development area spanning approximately 21 kilometres and turbines extending across about 39 degrees of the horizon. This results in a moderate and significant overall effect that directly affects the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, Nunnery, and high crosses, is central to its cultural significance. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional visual viewpoints—specifically from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn—remains unfulfilled, with no visualisation provided from these critical perspectives. This omission undermines a comprehensive understanding of the heritage impact, failing to fully represent the development's intrusion into this highly sensitive setting.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's consultants did not assess habitability, despite identifying it as a potential pathway of effect. The perceived scale of the turbines can be better appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would exceed Ben Hynish by around 194 metres while situated at roughly two-thirds of that distance, highlighting the disproportionate visual intrusion. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the true extent of impacts on Iona, warranting a more rigorous and comprehensive reassessment.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes includes some acknowledgement of significant impacts; however, it falls short in fully addressing the scale and nature of these effects, particularly when compared to proposed mitigation measures. For example, while the assessment recognises significant effects at Erraid and on the Core Paths of the Ross, and concedes that Fionnphort—a vital gateway community for visitors to Iona—would experience notable impact, the overall attribution of magnitude remains moderate. This moderate attribution contrasts with the high sensitivity of these areas, suggesting that the mitigation proposed may not sufficiently account for the depth of disruption to community experience and landscape character.

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

Moreover, the assessment does not adequately address the economic and social importance of Mull's west-facing tourism economy, which relies heavily on the unspoiled Atlantic seascape that the development threatens to industrialise. Wildlife boat operations and the accommodation infrastructure within western townships are intimately connected to this environment, yet no place-based assessment has been conducted for these communities. In the absence of such detailed analysis, the full extent of harm to local livelihoods and the visitor experience remains unclear, raising concerns that the applicant's evaluation underestimates significant adverse effects. Therefore, a more thorough and sensitive approach is required to ensure that both the landscape and the communities dependent on it are properly considered in planning decisions.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres

but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

The applicant's assessment significantly understates the magnitude of change and impact on the sensitive and distinctive landscape character of Tiree, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, located approximately 35 kilometres from the development, has been attributed a Low magnitude of change despite being assessed as having High sensitivity. This is a critical inconsistency because Tiree is an exceptionally low-lying island whose entire landscape character is defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, which underscores the scale of vertical elements introduced by turbines reaching up to 335 metres in height. Such turbines would represent unprecedented vertical structures in Tiree's open oceanic horizon and seascape, fundamentally altering the island's distinctive character. Given this context, the conclusion that the magnitude of change is Low exemplifies a severe understatement of effects. Therefore, the applicant's evaluation cannot be regarded as reliable, and a reassessment that properly acknowledges the pronounced landscape impact on Tiree is necessary.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

The applicant’s environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a significant underestimation of impacts, as it applies a generalized attenuation without accounting for the specific characteristics or vulnerabilities of the affected receptors. Consequently, the communities residing in these more distant locations have not been subjected to any detailed, place-based assessment, leaving a critical gap in the understanding of potential adverse effects.

This methodological limitation undermines the overall integrity and completeness of the environmental impact assessment. By failing to recognise and appropriately evaluate significant effects beyond the arbitrary 20-kilometre threshold, the applicant’s approach neglects the nuanced realities of landscape sensitivity and community experience. Such systematic discounting risks the marginalisation of affected populations and compromises the robustness of environmental decision-making processes. It is therefore essential that assessments adopt a more nuanced and receptor-specific approach to accurately capture and address the full extent of environmental impacts.

1.1.309 Personal Observations

In addition to the planning matters above, I am personally concerned because: The beauty and peacefulness will be impacted

Based on my own local knowledge, I also wish to highlight that: The sea views and the impact to wave patterns and the effect on the beaches

Finally, I would also ask the Scottish Ministers to consider: No

1.1.310 Further Comments

No

1.1.311 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant’s documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they

require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 132
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm, which is the subject of two applications: application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this letter be recorded as an official objection, that I be listed as an objector, and that I receive notification of the outcome of these applications.

The development proposed comprises an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would consist of between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a designated Windfarm Development Area covering around 448 square kilometres of sea to the north-west of Islay and west of Colonsay. The location is approximately 21 kilometres from the island of Iona and is situated in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which are elaborated in the following sections with reference to the relevant statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies entirely with the applicant to provide sufficient evidence demonstrating compliance with the applicable tests prescribed by law and policy. Objectors are not required to establish contrary proof. On the basis of the evidence presented, the applicant has failed to satisfy this burden, and accordingly, consent ought to be refused.

1.1.312 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify a distance threshold beyond which major effects cease, yet analysis of their own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of receptor sensitivity or visibility extent. Furthermore, the applicant’s documents acknowledge distance’s influence by judging the scale of change as small at viewing distances exceeding 30 kilometres, with Landscape Character synthesis indicating High magnitude effects within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances corresponding to the location of the most sensitive designated landscapes results in understated inputs to the protective tests applied. Consequently, the conclusions reached by the applicant do not reliably represent the true effects for which Scottish Ministers are asked to grant consent, undermining the robustness and transparency of the assessment’s findings.

When considering the visual impact of the proposed development, it is important to compare the extent to which mitigation measures can address potential adverse

effects. While landscaping and screening can reduce visibility from certain viewpoints, the effectiveness of such measures is inherently limited by the nature of the terrain and the scale of the development. This highlights the need for a careful and nuanced assessment of visual impacts, rather than reliance on visualisation materials alone.

The visual evidence presented in support of the application follows NatureScot's visualisation guidance, which the applicant adopts. This guidance acknowledges a fundamental limitation: printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Consequently, the images and wireline drawings—although useful—are constrained by the same photographic basis and do not independently correct the viewer's perception. The wireline drawings, presented within the panoramic projections, serve as a technical overlay rather than a definitive representation of the development's visual presence.

Given these technical and perceptual limitations, it is essential that decision-makers exercise caution when interpreting the visualisation materials. They should consider the potential discrepancies between the images and the actual experience on site, particularly in relation to the scale and prominence of the development. Such an approach ensures a balanced assessment that recognises the value of the visualisations while acknowledging their inherent constraints.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the night-time seascape character for the duration of its stated 35-year operational life. This change would be perceptible and sustained, fundamentally affecting the visual experience and natural qualities of the seascape during nighttime conditions.

Beyond this timeframe, the policy implications must be carefully considered. Consenting to the development effectively signals that this seascape is appropriate for wind farm use, establishing a precedent that may influence future decisions. Thus, the impact on night-time seascape character is not merely a temporary effect but bears significant weight in the planning balance and the long-term management of seascape values.

While the applicant acknowledges certain effects on landscape and seascape interests, it has failed to demonstrate that these effects have been adequately mitigated in accordance with relevant policy requirements. Specifically, these effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has not shown that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Consequently, compliance with policies designed to protect nationally important landscapes and seascapes remains unproven, undermining the proposal's conformity with the established planning framework.

1.1.313 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty regarding the applicant's assessment methodology and the reliability of its conclusions about the impacts on heritage assets. Although the applicant states that it has adopted Historic Environment Scotland's recognised approach for evaluating effects on the setting of historic assets, questions remain about whether this methodology has been correctly applied. This approach, developed through consultation with Historic Environment Scotland, requires a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset, with particular emphasis on assessing whether the integrity of setting is maintained. Importantly, the methodology makes clear that visual change alone should not be directly equated with adverse impact.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's own Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed in line with the accepted methodology. Instead, the assessment focuses on describing visual changes such as visibility, distance, prominence of monuments, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without showing the required evaluative step that distinguishes between visual change and impact, as mandated by the methodology. This key evaluative analysis is absent in all the examples examined by the Audit.

Given this lack of demonstrated compliance with the prescribed methodology, the assessment's conclusions about the impacts on the heritage setting are undermined and cannot be relied upon without further clarification and evidence. It is therefore essential that the methodology be fully and transparently applied, with the necessary evaluative steps clearly articulated, to ensure a robust and credible understanding of heritage impacts in this case.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, notably pilgrimage, arrival by sea, and movement through a living cultural landscape. It highlights the importance of the relationships between monuments, spirituality, and their surrounding landscape and seascape, emphasising that these are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—have requested additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the wider cultural context and experiential dimensions that contribute to the heritage assets' significance. Therefore, further consideration is necessary to properly address these aspects in the heritage impact appraisal.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the same understatement. This creates a chain of understated impacts, whereby the significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

The application fails to demonstrate compliance with essential policy provisions designed to protect heritage assets, notably those set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers have not been presented with the necessary assessment to reach a reasoned conclusion on this matter. In light of this absence of demonstrable protection and assessment, the application does not meet key policy requirements for heritage protection and thus cannot be considered acceptable.

1.1.314 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are attracted specifically by the qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes form the foundation of the visitor experience and underpin the local economy, making them integral to the viability of these communities. Any alteration to these defining characteristics would therefore have a direct and significant impact on the economic base that sustains these islands.

Such an impact would extend beyond the immediate economic consequences to affect essential local services, population stability, and the overall sustainability of the communities. The interdependence of the economy and social fabric means that changes diminishing the qualities which draw visitors threaten not only financial prosperity but also the continuing viability of these island settlements. It follows that the proposal, by jeopardising the very qualities that attract visitors, poses a fundamental risk to the long-term economic and social sustainability of the island communities.

The applicant’s own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic

assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.315 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application's compliance with relevant environmental protections.

Mitigation, compensation proposals, and future monitoring, while important components of environmental management, do not in themselves satisfy the stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected habitats. The Regulations mandate that consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are met. This places the burden of proof firmly on the applicant to demonstrate compliance with these high evidential standards. This framework is reinforced by relevant provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Any consent granted without meeting these rigorous tests would be incompatible with the established statutory and policy requirements governing protected habitats and species.

There remains significant uncertainty as to whether the application meets the necessary statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, clearly indicates that the degree of certainty required has not been achieved. Consequently, it has not been demonstrated that these legal requirements can be satisfied, undermining the justification for granting consent.

1.1.316 Cumulative and In-Combination Effects

The assessment of the current project is fundamentally flawed because it considers only a portion of the development before the Scottish Ministers, with significant

components such as the export cable corridor and the onshore transmission works deferred to future applications. These elements are essential for the wind farm's operation, yet their effects are excluded from the present evaluation. Consequently, the project's impacts are never assessed in their entirety, but rather fragmented across separate consenting processes that follow the principal decision. This piecemeal approach contravenes established legal principles, as affirmed by the courts in Raeshaw Farms, which require that a project must be assessed comprehensively rather than being artificially divided into smaller parts whose individual effects might appear less significant. Therefore, the current assessment does not satisfy the necessary procedural and legal standards for a holistic evaluation of the project's impacts.

The practical consequence of relying on the current cumulative impact assessment is that the true combined effects of the proposed development alongside existing, consented, and foreseeable projects are significantly underestimated. This has important implications for decision-makers who depend on accurate evaluations to fully understand potential environmental and socio-economic consequences. An understated baseline leads directly to an understated cumulative impact, which risks overlooking meaningful harm that may arise from the aggregate of developments in the area.

This problem arises because the cumulative assessments draw upon conclusions established elsewhere in the Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have already minimized or failed to fully capture the extent of effects, the cumulative assessment necessarily begins from this flawed baseline. As a result, the combined effects are not properly accounted for, reducing the reliability of the overall assessment and weakening the evidential basis for planning decisions.

In light of this, the cumulative impact assessment cannot be considered a robust or trustworthy reflection of the likely combined effects of development in the locality. A more rigorous and comprehensive baseline evaluation is essential to ensure that cumulative assessments accurately reflect reality. Without this, the planning process risks proceeding on an incomplete understanding of potential impacts, which may lead to inadequate mitigation measures or inappropriate approval of proposals.

The failure to adequately assess the cumulative and in-combination effects of the proposed development has practical consequences for the robustness of the planning decision. Without a comprehensive evaluation of the project as a whole, including deferred works, the decision-maker cannot fully understand the environmental impacts, potentially leading to unforeseen harm and ineffective mitigation measures.

This shortfall constitutes non-compliance with established planning policies and environmental regulations. Specifically, the proposal engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations regarding project splitting. These policies and regulations require that all related works are considered collectively to ensure a reliable identification and assessment of effects.

In light of this, it is essential that the determination explicitly addresses the treatment of deferred works and their cumulative impacts. Only by doing so can the decision-making process align with statutory requirements and provide a sound basis for sustainable development.

1.1.317 Public Engagement, Site Selection and Environmental Information

The shortcomings in public participation and the timing of consultation materially diminish the credibility of the site-selection process, particularly when compared to the rigorous standards expected under GEN 18 of the National Marine Plan and the Aarhus Convention's principles. The applicant invites Scottish Ministers to place significant weight on the site-selection process; however, this is undermined by persistent deficiencies in engagement at both the plan and application stages. Notably, the consultation period coincided with the busiest months for island communities, who face continuous work throughout the visitor season and reduced access to specialist advice. This contrasts sharply with the applicant's extensive preparation, supported by substantial professional and financial resources over several years. Given these imbalances, those affected have not been afforded a realistic opportunity to participate in decisions of such consequence. It is therefore essential that Ministers carefully consider the limitations of the consultation process when evaluating the representations submitted.

In comparing the proposed mitigation measures with the environmental information provided, it is evident that the Environmental Impact Assessment (EIA) falls short of sufficiency required for a robust determination. While the application includes various assessments, these rely on methodologies that do not substantiate their conclusions adequately. For instance, the landscape assessment applies outcomes based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate adherence to its prescribed integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. Moreover, the application anticipates the resolution of certain significant effects through future assessments, post-consent plans, monitoring, and additional approvals, which do not fulfil the EIA Regulations' requirement that likely significant effects must be comprehensively understood prior to determination.

Consequently, the Scottish Ministers are compelled to base their decision solely on the evidence presented at the time of determination, without reliance on assumptions that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted meets the adequacy standard necessary for informed decision-making. This insufficiency undermines the integrity of the assessment and precludes the Ministers from confidently concluding that the environmental implications of the proposal have been properly identified and addressed.

1.1.318 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly considers Islay in terms of its potential as a direct project location rather than evaluating it as an affected island

community in its own right. This approach neglects the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area without any place-based assessment of the effects on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that defines daily life faces the development array directly, with the North Colonsay and Western Cliffs Special Protection Area forming part of Colonsay's own coastline. This area is central to the applicant's derogation case and compensation plan, reflecting an explicit acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same shortcomings identified in the heritage assessment, particularly regarding the inadequate treatment of its open maritime setting. Taken together, these omissions and underassessments undermine the reliability of the environmental and heritage impact evaluation with respect to the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

The applicant's own Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment concludes a moderate and significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impacts on this heritage asset.

Community concerns further emphasise the scale of effect, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has never been assessed for this community. To contextualise the visual scale, the largest turbines would overtop Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by about 194 metres at roughly two-thirds of that distance.

Taken together, these points demonstrate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona. This undermines the accuracy of the environmental and social impact evaluation and warrants further, more rigorous assessment to fully understand and address the effects on this sensitive and internationally important locale.

The applicant's assessment fails to adequately address the practical consequences for the communities of Mull and Ross of Mull, particularly those whose livelihoods depend on tourism and the unspoiled coastal environment. Fionnphort, as the gateway to Iona and the primary embarkation point for visitors, is identified by the applicant as significantly affected, yet no tailored, place-specific mitigation or engagement appears to have been undertaken for this community directly bound to visitor flows. This omission risks undermining the economic and social fabric of a community reliant on tourism.

Moreover, while the applicant recognises significant effects on Core Paths and local landscape areas across Mull, including Central, South and West Mull, and the Loch na Keal National Scenic Area, these are attributed only Medium magnitude despite the acknowledged High sensitivity of these landscapes over distances ranging from 21 to 33 kilometres. The assessment's reliance on distance-based criteria, as exemplified by its treatment of the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, appears to underestimate the visual and experiential impacts on these highly valued and designated landscapes.

Finally, the importance of Mull's west-facing tourism economy and its associated wildlife boat operations, alongside the accommodation and support of western townships, is not adequately reflected in the assessment. These communities depend on the integrity of the Atlantic seascape, which the proposed development would industrialise, yet no place-based assessment or consideration of their specific economic and cultural reliance has been provided. This lack of detailed, localised analysis undermines confidence that the significant visual, economic, and community impacts on these coastal areas have been properly understood or addressed.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, and attempts to evaluate the potential effects of the proposed development on their qualities. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the early stages of regeneration, with a small population whose recovery relies heavily on the integrity of its natural setting and unspoilt seascape. However, the applicant's assessment does not provide a specific evaluation of the effects on Ulva's landscape or community, despite the island sharing fully in the impacts on the designated area.

Regarding Staffa, although located approximately 35 kilometres from the development site—beyond the 30-kilometre radius recommended by NatureScot for assessment of National Scenic Area qualities—the applicant acknowledges the panoramic maritime qualities of the island but concludes that the scale of change would be small and the effect not significant. This conclusion appears to downplay the importance of Staffa's celebrated status as one of Europe's most renowned small islands.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of

effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

In summary, while the applicant's assessment acknowledges the presence of these important designated landscapes and their varying sensitivities, it appears to underestimate or omit detailed consideration of significant effects, particularly with regard to Ulva's vulnerable island community and the cultural and natural qualities of the more distant but highly valued islands such as Staffa and Jura. This raises concerns that the full extent of potential impacts on these landscapes and communities has not been adequately addressed, thereby undermining the protection of their distinctive natural and cultural characteristics.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area at a distance of approximately 35 kilometres, this conclusion appears inconsistent when contrasted with the inherently sensitive nature of Tiree's landscape. The area is correctly identified as having High sensitivity, yet the scale of the proposed turbines—up to 335 metres in height—would introduce vertical elements unprecedented in the island's seascape. Given that Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, reaching only 141 metres, the dominance of sea and sky fundamentally defines its landscape character. The introduction of turbines more than twice this height would significantly alter the open oceanic horizon that is central to Tiree's distinctive sense of place. Consequently, a Low magnitude of change understates the true extent of visual and landscape impact on such an exposed and sensitive receptor. Therefore, the applicant's evaluation cannot be regarded as a reliable reflection of the likely effects on Tiree's landscape character.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation has been applied in this objection, calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant's assessment cannot be regarded as comprehensive or sufficiently robust.

The environmental impact assessment systematically underestimates the significance of effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This finding arises from a consistent pattern in the applicant’s methodology, where the magnitude of change experienced by these receptors is moderated and their effects discounted. Such an approach inherently diminishes the recognised sensitivity and importance of distant communities.

Crucially, this distance-based moderation results in the omission of any place-based assessment for the communities affected beyond this threshold. As a consequence, the lived experiences and concerns of these populations remain unaddressed within the assessment framework. This absence undermines the comprehensiveness and integrity of the environmental evaluation, which ought to fully account for all significant effects regardless of geographic distance.

In conclusion, reliance on an arbitrary 20-kilometre cut-off to moderate effects cannot be justified where highly sensitive receptors exist beyond this range. A thorough and place-specific assessment is essential to ensure that all significant impacts are appropriately identified and mitigated. Without such rigor, the assessment fails to meet the necessary standards of environmental scrutiny and public accountability.

1.1.319 Personal Observations

In addition to the planning matters above, I am personally concerned because: As an Associate Member of the Iona Community and a regular visitor to Mull and Iona, I regard the islands as my adopted spiritual home. I am also passionately committed to protecting the natural environment and flora and fauna of Iona, Mull, Staffa and all the Western Isles and surrounding seas. Taking sail boat trips to see the beautiful coastlines and the marine wildlife has been a great source of pleasure to me, my husband, and groups of pilgrims we have brought from Cambridgeshire, as well as many others from around the globe we have met on these visits. Similarly taking the Staffa Tour boats to see the puffins on Staffa and Fingals Cave have been fascinating and awe inspiring experiences. In particular it is moving to think that the landscape and seascape has changed little since St Columba and his followers first came to the island and since the composer Mendelssohn visited Fingal's Cave. I am not opposed to renewable energy, on the contrary I believe it is vital to our future on this planet. However, I stand with the island communities in objecting to this very large wind farm which is likely to have profound negative impacts on wildlife and on the spiritual and historical heritage of their beautiful home, and thereby on their livelihoods. In particular it seems unfair that the island communities themselves do not stand to gain financially or otherwise from the development.

1.1.320 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. Moreover, independent scrutiny of the submitted documentation reveals that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the

island communities were identified, they have never undergone a comprehensive appraisal. Additionally, the ecological criteria required to support the proposal have not been satisfactorily demonstrated as achievable. It is also notable that only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers contemplate approval, it is requested that they first mandate the submission of further environmental information and enhanced visual representations. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing for thorough examination of the concerns raised in this objection. Irrespective of the ultimate decision, it is also requested that Ministers explicitly address and conclude on the proposal's effects on cultural heritage and the island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 133
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, identified by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area covering around 448 square kilometres of marine environment. This location lies north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

I request that this letter be formally recorded as an objection, that my status as an objector be duly noted, and that I be informed of the determination made in respect of these applications.

The grounds of my objection are firmly grounded in planning and environmental considerations, which are assessed against the statutory and policy frameworks applicable to these proposals. It is important to emphasise that the onus lies with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy requirements are met. Objectors, including myself, are not obliged to establish contrary proof. Upon examination of the evidence presented, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications do not satisfy the necessary criteria and therefore consent ought to be refused.

1.1.321 Legislative and Policy Framework

The application fails to demonstrate that reasonable steps have been taken to mitigate adverse effects on natural beauty, flora, fauna, geological or physiographical features of special interest, and sites, buildings or objects of architectural, historic or archaeological interest, as required by Schedule 9 of the Electricity Act 1989. The evidence does not establish that the applicant has adequately addressed these statutory duties, nor does it provide sufficient detail on mitigation measures to offset the identified impacts. This omission is critical because the statutory framework explicitly mandates both the applicant and the Scottish Ministers to have regard to these considerations in the determination process.

Furthermore, the application exhibits clear deficiencies and omissions in complying with the legal and policy requirements set out in Schedule 9. The absence of demonstrated compliance and the presence of evidential shortcomings directly conflict with the statutory duties under the Electricity Act 1989. Such failures weigh decisively against the granting of consent, as the statutory regime prioritises the preservation and protection of natural and cultural heritage interests, which the application does not satisfactorily uphold.

The marine licence application fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies—including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts)—constitutes a fundamental procedural and substantive deficiency.

The application's failure to provide sound evidence and to address cumulative impacts, as required by GEN 19 and GEN 21, undermines the statutory assessment process. Moreover, omissions and conflicts with policies protecting the historic environment, landscape, natural heritage, and requirements for effective engagement further demonstrate that the application does not meet the legal and policy standards mandated by the National Marine Plan. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent.

In light of these deficiencies, omissions, and conflicts with the applicable legal and policy framework, the marine licence application cannot be considered compliant with the Marine (Scotland) Act 2010 or the National Marine Plan. Consequently, the application should be refused on the grounds that it does not satisfy the statutory criteria for authorisation.

The proposal fails to comply with essential policies set out in National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. As a significant material consideration, NPF4 must be applied rigorously alongside statutory duties and legislative requirements. The application does not demonstrate compliance with these policies, resulting in clear deficiencies and omissions that undermine the statutory and policy framework governing this development.

The evidence confirms that where compliance with NPF4 policies has not been demonstrated, or where there are identified conflicts with the legal and policy framework, these shortcomings must weigh against the granting of consent. In this case, the proposal's failure to meet the requirements of Policy 3 on biodiversity and Policy 4 on natural places indicates a disregard for protecting and enhancing the natural environment. Similarly, the absence of adequate measures to safeguard historic assets under Policy 7 further exacerbates the proposal's non-compliance. The energy considerations under Policy 11 are also insufficiently addressed, failing to meet the standards expected by the framework.

Given these unresolved deficiencies and the explicit requirement within NPF4 to apply these policies in full, the proposal cannot be considered compliant with the national planning framework. The failure to demonstrate adherence to these critical policies, combined with the identified omissions and conflicts, constitutes a material planning objection. Accordingly, the application should be refused on the basis that it

does not satisfy the statutory and policy obligations imposed by National Planning Framework 4.

The applicant's submission fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the likely significant environmental effects of the proposal be identified, thoroughly assessed, and transparently reported prior to any determination. The absence of a comprehensive and compliant EIA undermines the decision-making process by leaving critical environmental impacts insufficiently examined and documented. This deficiency is not a minor procedural oversight but a fundamental failure to meet statutory requirements designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which demand a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these tests, nor does it adequately address potential adverse impacts on designated habitats. This omission represents a clear conflict with the legal framework governing the protection of biodiversity and designated conservation sites. Without a proper Habitats Regulations Assessment (HRA), the proposal cannot be considered lawful or consistent with established environmental protection policies.

Given these significant shortcomings—the incomplete EIA and the failure to conduct a compliant HRA—the proposal is in direct conflict with the statutory and policy requirements set out to ensure environmental protection. Where compliance has not been demonstrated, and where evidence reveals deficiencies and omissions, these matters must weigh decisively against the granting of consent. The application, as it stands, does not meet the necessary legal standards and should therefore be refused on these grounds.

The applicant's submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework, as set out in the Act, establishes a clear duty to ensure that the unique social, economic, and environmental characteristics of island communities are properly accounted for when determining planning applications that may affect them.

However, the evidence before the determining authority does not demonstrate compliance with this statutory duty. There are notable deficiencies and omissions in the applicant's assessment regarding the specific impacts on island communities. The submission fails to provide a comprehensive evaluation of how the proposal would affect these communities, nor does it adequately weigh their interests in accordance with the requirements of the Islands (Scotland) Act 2018. This lack of thorough consideration constitutes a procedural defect in the planning application process.

Given that the applicant has not demonstrated compliance with the statutory duty, and that the evidence identifies clear shortcomings in addressing the interests of

island communities, these matters must weigh against the granting of planning consent. The failure to properly consider and give due weight to the interests of island communities is a material consideration that conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. Therefore, the proposal should be refused on this basis.

The applicant has failed to meet the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is a well-established principle that the evidential burden lies with the applicant to prove that every statutory duty, planning policy, and environmental assessment obligation has been satisfied. In this case, the submitted evidence does not fulfill this burden.

Specifically, the application lacks sufficient demonstration that all applicable statutory duties and planning policies have been adhered to. The absence of comprehensive and conclusive evidence leaves critical uncertainties and omissions unaddressed. Furthermore, where the evidence does exist, it reveals deficiencies and conflicts with the relevant legal and policy frameworks. Such shortcomings are material and weigh decisively against the granting of planning consent.

In summary, the applicant has not discharged the required evidential responsibility to prove compliance with the full spectrum of legal and policy obligations. This failure constitutes a clear and substantive reason to refuse consent.

1.1.322 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. Although the policy offers support for renewable energy development, such support is expressly conditional upon adherence to its impact provisions, notably those relating to communities and the natural and cultural environment.

Specifically, the proposal appears to conflict with key elements of Policy 11. It would result in significant adverse effects on nationally designated landscapes and seascapes, while the protection of the cultural significance of scheduled monuments and their settings has not been satisfactorily demonstrated. Furthermore, there is a lack of evidence to confirm that island communities would be adequately safeguarded, and the ecological assessments submitted fail to show that necessary environmental tests can be met.

Given these uncertainties and identified shortcomings, the proposal does not presently meet the comprehensive impact requirements of NPF4 Policy 11. This undermines the policy’s conditional support for the development and raises serious concerns about its overall compliance.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) to safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on their designated qualities.

Additionally, it does not meet the requirements of Policy 7, including Policy 7(h) relating to scheduled monuments and Policies 7(c) and 7(d) concerning the setting of historic assets. Furthermore, the proposal does not demonstrate adequate protection for island communities as required, nor does it satisfy the ecological tests set out in Policy 3 on biodiversity. Taken together, these shortcomings indicate that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, fail to protect the cultural significance of scheduled monuments and their settings, and fall short in safeguarding the natural environment in accordance with NPF4.

The proposal is found to be in conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This adverse impact demonstrates inconsistency with the development plan as a whole. Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy framework, and the applicant has not provided sufficient evidence to dispel this conclusion. Therefore, the proposal fails to accord with the relevant land-based policies and should be refused accordingly.

1.1.323 Seascape, Landscape and Visual Effects

The assessment methodology employed by the applicant exhibits a significant limitation in its treatment of distance thresholds, which undermines the reliability of the predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nevertheless, a published Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Further examination of the applicant's own documents confirms the critical role distance plays in shaping these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the site concludes that, owing to the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented fail to provide a reliable description of the effects that the Scottish Ministers are being asked to consider for consent.

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent

limitation means that the visualisations may underrepresent certain perceptual effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

The introduction of aviation and navigation lighting associated with the proposed development would fundamentally alter the night-time seascape character. At present, the sea horizon remains unlit, preserving a natural and uninterrupted nocturnal environment. The permanent illumination over the 35-year operational period would create an artificial visual feature, changing the existing character and experience of the seascape in a way that cannot be mitigated by current proposals. While some forms of lighting may be designed to minimise adverse effects, the essential nature of these safety-related lights means that their presence is unavoidable and will result in a lasting alteration to the seascape.

Furthermore, it is important to recognise that the 35-year operational lifespan does not diminish the significance of this harm in planning terms. Granting consent for the development effectively establishes that this seascape is appropriate for wind farm use, setting a precedent for similar proposals and the acceptance of such visual impacts. This policy implication underscores the need for careful consideration of the wider consequences of permitting lighting-induced changes to the night-time seascape character, beyond the operational timeframe. Therefore, any decision to approve the development must weigh the permanence of the seascape transformation against the strategic objectives that the wind farm seeks to achieve.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has not adequately demonstrated that its assessment of the scale of the accepted effects aligns consistently with its own stated methodology. This inconsistency raises doubts about the reliability of the conclusions presented and undermines confidence in the assessment's findings.

Moreover, the proposal fails to establish compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Given this lack of demonstrated conformity, it is evident that the proposal does not meet the requisite policy standards, and accordingly, it should not be supported.

1.1.324 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty regarding the applicant's assessment methodology and the reliability of its conclusions about the impacts on heritage assets. Although the applicant states that it has adopted Historic Environment Scotland's recognised approach for evaluating effects on the setting of historic assets, questions remain about whether this methodology has been correctly applied. This approach, developed through consultation with Historic Environment Scotland, requires a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset, with particular emphasis on assessing whether the integrity of setting is maintained. Importantly, the methodology makes clear that visual change alone should not be directly equated with adverse impact.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's own Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed in line with the accepted methodology. Instead, the assessment focuses on describing visual changes such as visibility, distance, prominence of monuments, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without showing the required evaluative step that distinguishes between visual change and impact, as mandated by the methodology. This key evaluative analysis is absent in all the examples examined by the Audit.

Given this lack of demonstrated compliance with the prescribed methodology, the assessment's conclusions about the impacts on the heritage setting are undermined and cannot be relied upon without further clarification and evidence. It is therefore essential that the methodology be fully and transparently applied, with the necessary evaluative steps clearly articulated, to ensure a robust and credible understanding of heritage impacts in this case.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls

short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions derived from it cannot be regarded as reliable. Where the landscape effects have been understated, as previously detailed, any conclusions about heritage impacts that rely on this assessment inevitably reflect the same understatement. This dependency undermines the credibility of the heritage evaluation and raises serious concerns about the robustness of the overall appraisal.

It is essential to recognise that the heritage conclusions are not independent but are intrinsically linked to the landscape assessment. As the evidence from source S01 makes clear, the heritage conclusions “depend upon the landscape assessment,” meaning that any errors or omissions in the latter directly influence the former. Therefore, if the landscape assessment fails to accurately capture the extent or significance of landscape effects, the heritage conclusions built upon it must be regarded as compromised.

In light of this interdependency, the planning process must take account of the potential underestimation of landscape effects and the consequent impact on heritage conclusions. Without a thorough and accurate landscape assessment, the heritage impact appraisal lacks a sound evidential basis, which could lead to inappropriate decision-making. It is thus imperative that the landscape assessment is revisited and rectified to ensure that heritage impacts are properly understood and addressed in the planning determination.

The proposal fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) relating to scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a stringent framework for safeguarding the cultural significance of heritage sites and their environs.

Despite this clear policy context, the applicant has not provided adequate evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, including their settings, will be preserved. Crucially, the Scottish Ministers do not have before them the comprehensive assessment that would be necessary to reach such a conclusion. This absence undermines confidence in the proposal's capacity to protect these irreplaceable assets effectively.

In light of the above, it is concluded that the application does not meet the key policy requirements for heritage protection and therefore cannot be considered acceptable. Proper adherence to the relevant policies is indispensable to ensure that heritage assets are preserved for current and future generations, a standard that this proposal fails to satisfy.

1.1.325 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by the proposed development rely exceptionally heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are integral to the islands' appeal and underpin their visitor economy. Any alteration or degradation of these qualities would directly undermine the economic foundations of these communities. This, in turn, threatens the provision of local services, the retention of population, and ultimately the long-term viability of the islands as sustainable communities. The proposal thus poses a significant risk to the fundamental economic and social sustainability of the island communities by impacting the very characteristics that sustain their visitor-dependent economies.

The practical consequence of the applicant's flawed socio-economic assessment methodology is a significant risk that the specific impacts on island communities will be misunderstood and inadequately mitigated. The applicant's consultants themselves identified habitability as a potentially significant pathway for effects on these communities, yet no targeted assessment of island habitability was conducted. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, detailed only for port communities, and fails to provide an equivalent place-based assessment for the islands directly facing the proposed development. Despite this omission, the assessment concludes that island communities exhibit low sensitivity to tourism effects, a conclusion unsupported by detailed evidence.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Their economic structures are heavily concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers amplifies dependence on these critical qualities, which are precisely those at risk from the proposed development. Therefore, any assertion of low sensitivity to tourism impacts, made without detailed, place-specific analysis, constitutes an unsubstantiated assumption rather than a reasoned conclusion.

Given these shortcomings, the socio-economic assessment fails to provide a robust basis for understanding or addressing the specific vulnerabilities of island communities. Without proper, place-based analysis, the potential socio-economic consequences for these communities remain unclear and inadequately accounted for within the planning process. Accordingly, the application should be reconsidered to ensure that the assessment methodology appropriately reflects the unique sensitivities of island economies and supports effective mitigation strategies.

The applicant acknowledges that island communities warrant specific and careful consideration within the planning process. However, the evidence demonstrates a failure to undertake the necessary assessment to understand the proposal's effects on these communities. This omission runs counter to the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting marine and coastal environments be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose

statutory obligations to assess and accord weight to the interests of island communities through meaningful engagement from the earliest stages of a proposal through to its conclusion.

In light of this, the proposal has not demonstrated compatibility with the sustainable development of island communities, nor has it satisfied the statutory duties owed to these populations. Without evidence that meaningful engagement has occurred or that the socio-economic impacts have been thoroughly evaluated, the decision-making process fails to align with established policy and statutory frameworks. Accordingly, the proposal cannot be considered compliant with the necessary standards for the protection and promotion of island community interests.

1.1.326 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgment of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it is not possible to exclude an adverse effect on the integrity of a protected site, and their inclusion in the application underscores the applicant's recognition of this risk. Notably, the reliance on these derogation and compensation plans indicates that the applicant accepts the necessity of measures to address impacts that may arise, yet leaves open the possibility that Scottish Ministers might reach a different conclusion regarding the presence or severity of any adverse effects. This approach reflects a cautious and procedural step towards mitigation but does not in itself resolve the question of whether significant effects on the protected site can be avoided.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains

regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The application before the authority has not demonstrated compliance with the statutory tests designed to protect internationally important habitats and species. This failure is evident from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty that these legal requirements can be met. As such, the risk of harm to protected ecological features remains unacceptably high.

It is essential to recognise that these statutory protections are in place precisely to safeguard internationally significant environmental assets. The applicant's inability to satisfy these tests undermines the fundamental purpose of these safeguards. Without clear and demonstrable evidence that the statutory criteria have been fulfilled, the justification for granting consent is significantly weakened.

In conclusion, the absence of robust assurance that the statutory tests have been met means the application cannot lawfully proceed. For these reasons, the proposal should be refused to ensure the continued protection of internationally important ecological interests.

1.1.327 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion of it is presently before the Scottish Ministers. Critical components, namely the export cable corridor and the onshore transmission works, are excluded from this application and deferred to subsequent proposals. Without these elements, the wind farm cannot function, yet their impacts are not considered alongside the main project in a single, comprehensive assessment.

This fragmented approach results in an incomplete evaluation of the project's overall effects. By deferring important parts to later consenting processes, the cumulative and interrelated impacts cannot be properly understood or weighed at the principal decision stage. Such segmentation raises concerns about the adequacy and legality of the environmental and planning assessments undertaken to date.

Importantly, this method is contrary to established legal principles. The courts, in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety and not artificially divided into smaller parts whose individual impacts might appear less significant. Therefore, the current assessment process undermines these principles by effectively salami-slicing the project, which calls into question the validity of the consent decision based on incomplete information.

The cumulative impact assessment presented in the Environmental Impact Assessment is fundamentally unreliable due to flawed baseline assessments. Specifically, the cumulative assessments rely on conclusions drawn from the underlying landscape, heritage, and socio-economic evaluations. As these foundational assessments understate the effects, the cumulative assessment consequently adopts a reduced baseline. This approach results in an underestimation of the combined effects of the proposed development alongside existing, consented, and foreseeable projects. Therefore, the true scale of cumulative impacts is obscured, undermining the accuracy and credibility of the overall environmental appraisal.

The assessment finds that the proposal fails to comply with the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. The applicant has not satisfactorily demonstrated that the cumulative and in-combination effects of the development have been reliably identified and assessed. Moreover, the effects of the project as a whole, including any deferred works, have not been adequately considered. It is therefore requested that the decision-making process explicitly addresses the treatment of these deferred works to ensure full compliance with relevant policies and regulatory obligations. In conclusion, without this comprehensive assessment, the proposal does not meet the necessary planning and environmental standards and should not be approved in its current form.

1.1.328 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation in that process is directly material to the decision. However, there have been clear deficiencies in participation not only at the plan and site-selection stages but persisting into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities. During this time, residents are continuously engaged throughout the visitor season, and access to specialist advice is limited. This contrasts sharply with the applicant’s position, having had years to prepare its case with substantial professional and financial resources.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by such decisions have a realistic opportunity to engage meaningfully. The conditions under which the affected communities have been expected to respond fall short of this standard. This undermines the legitimacy of the consultation process and, by extension, the site-selection process itself. It is therefore imperative that

Ministers bear these shortcomings firmly in mind when assessing the representations submitted in response to the application.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.329 Effects on Local Area

The applicant’s assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment’s comprehensiveness in addressing the real and tangible impacts on Islay’s residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community’s area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the

priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual, community, and heritage impacts on Iona, which undermines the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would extend across around 39 degrees of the horizon, notably affecting the ferry crossing between Fionnphort and Iona. Such a scale of visual intrusion cannot be regarded as minor or negligible.

Furthermore, the West Coast of Iona is similarly characterised by high sensitivity and widespread visibility, with the applicant acknowledging significant effects on residents and visitors, including at Dùn Ì, the island's highest point. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors clearly impacted by the proposed development. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby omitting critical perspectives.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona found that 92 per cent of respondents object to the proposal, yet habitability—a pathway of potential effect identified by the applicant's own consultants—was never properly assessed. The perceived scale of the turbines is stark when compared to familiar landmarks: Ben Hynish on Tiree, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres, at roughly two-thirds of that distance. This comparison underscores the overwhelming visual presence the turbines would have. Taken together, these factors demonstrate that the applicant's evaluation fails to adequately capture the scale and significance of the impacts on Iona, thereby compromising the integrity of the environmental and social impact assessment.

The applicant's assessment underestimates the practical impacts on the coastal communities and landscapes of Mull and Ross of Mull, particularly regarding their tourism-dependent economies and designated scenic areas. For instance, the Ross of Mull South coastal area is acknowledged as highly sensitive and experiences significant effects at key locations such as Erraid and the Core Paths of the Ross. Fionnphort, serving as the gateway to Iona and a crucial embarkation point for visitors, is identified as the community most directly affected by visitor flows, yet no dedicated place-based assessment has been provided for it. Similarly, significant effects are accepted across Mull's Core Paths and within important local landscape areas, including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, recognised for its high sensitivity throughout a viewing range of 21 to 33 kilometres, is only attributed medium magnitude effects, which

does not fully reflect the potential for adverse impacts. The applicant's reliance on distance as a primary factor, such as in the case of the Wilderness and Gribun Rocks coastal area where changes at over 30 kilometres are deemed small, oversimplifies the complex visual and experiential qualities that contribute to these landscapes' value. Moreover, the west-facing tourism economy, including wildlife boat operations and accommodation sectors reliant on the Atlantic seascape, faces potential industrialisation from the development, yet none of these communities have been afforded a place-specific assessment. This gap in the evaluation risks overlooking significant economic and community consequences that should be carefully considered in the planning decision.

The applicant's assessment overlooks significant impacts on key designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration, reliant on the unspoilt seascape and setting that are at risk; yet, no assessment of effects on Ulva has been undertaken. Staffa, also within the same National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range recommended by NatureScot for assessment of National Scenic Area qualities. Despite acknowledging the panoramic maritime character of Staffa, the applicant concludes that effects would be small and not significant, a conclusion that appears to underestimate the island's sensitivity. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed only as having medium to low magnitude effects at 28 to 32 kilometres, based largely on distance and retained landforms, which does not fully reflect the importance of its wild character. The Scarba, Lunga and Garvellachs National Scenic Area, at 35 to 40 kilometres, is treated in the same way, further indicating a consistent underestimation of effects on these important landscapes.

The applicant's assessment notably understates the magnitude of change experienced on Tiree when compared to the level of sensitivity attributed to the island's landscape. While the South Tiree coastal area is correctly identified as having High sensitivity at approximately 35 kilometres, it is paradoxically assigned a Low magnitude of change. This assessment fails to account adequately for Tiree's exceptional landscape character, which is defined by its exceptionally low-lying topography and the dominance of sea and sky. With the highest point, Ben Hynish, standing at only 141 metres, the introduction of turbines reaching up to 335 metres would create unprecedented vertical structures within the seascape. Given that Tiree's character depends on an open oceanic horizon, the presence of such large turbines would cause a significant and conspicuous change. Therefore, the conclusion of a Low magnitude of change for such a highly exposed and sensitive receptor is an understatement and renders the overall evaluation of effects unreliable.

The applicant's assessment has overlooked significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. Despite the island's finely balanced

community and economy, the assessment fails to examine the impacts on Gigha, thereby omitting consideration of a key receptor intimately linked to the seascape.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors to which the applicant's distance-based mitigation approach is applied, raising concerns about the validity of this method. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on open Atlantic seaboard views towards Islay, Jura, and surrounding waters, along with the Treshnish Isles and other small islands and mainland coasts overlooking the development site, have also been excluded from assessment. This omission undermines the comprehensiveness of the applicant's evaluation and leaves unaddressed potential adverse effects on these interconnected communities.

The applicant's environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.330 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Yes

1.1.331 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes as well as on the heritage and communities of the coastal area in question. However, analyses derived from the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been completed, and although the effects on the island communities affected by the development were identified, they have not been subject to proper evaluation. Furthermore, the project has not satisfactorily met the required ecological tests. It is also important to note that only a portion of the project currently lies before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers decide against refusal, I request that they require the submission of additional environmental information alongside enhanced visual

representations. Moreover, I recommend that the determination of these applications be deferred until after a public inquiry, thereby allowing thorough examination of the objections raised.

Regardless of the final decision, I further request that the Scottish Ministers provide explicit conclusions within their reasoning, specifically addressing the impacts on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 134
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) concerning the MachairWind Offshore Wind Farm, which is the subject of application numbers 00012385 and 00012386. Application 00012385 requests consent under section 36 of the Electricity Act 1989, while application 00012386 seeks a marine licence in accordance with Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be treated officially as an objection, that I be recorded as an objector, and that I receive notification of the decisions reached on these applications.

The proposed development involves establishing an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would comprise between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to the blade tip. The site encompasses a Windfarm Development Area of around 448 square kilometres, situated north-west of the Isle of Islay and west of Colonsay. Its location is roughly 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the planning and environmental grounds supporting my objection. These considerations are framed within the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to provide adequate evidence demonstrating that all relevant statutory tests and policy requirements have been met. Those opposing the development are not obliged to establish contrary proof. In this instance, the applicant has failed to meet this evidential burden, and for the reasons detailed below, consent ought to be refused.

1.1.332 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. Although the policy offers support for renewable energy development, such support is expressly conditional upon adherence to its impact provisions, notably those relating to communities and the natural and cultural environment.

Specifically, the proposal appears to conflict with key elements of Policy 11. It would result in significant adverse effects on nationally designated landscapes and seascapes, while the protection of the cultural significance of scheduled monuments and their settings has not been satisfactorily demonstrated. Furthermore, there is a lack of evidence to confirm that island communities would be adequately safeguarded, and the ecological assessments submitted fail to show that necessary environmental tests can be met.

Given these uncertainties and identified shortcomings, the proposal does not presently meet the comprehensive impact requirements of NPF4 Policy 11. This undermines the policy’s conditional support for the development and raises serious concerns about its overall compliance.

Policy 11 must be considered alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Additionally, Policy 7, including section 7(h) concerning scheduled monuments and sections 7(c) and 7(d) relating to the settings of historic assets, as well as Policy 3 on biodiversity, provide a comprehensive framework for the protection of designated assets. The proposal, however, fails to align with these policies.

Specifically, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their recognised qualities. It has not been adequately demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor that the interests of island communities would be safeguarded. Furthermore, the ecological tests mandated by Policy 3 have not been shown to be met based on the evidence submitted. Consequently, the proposal conflicts with the relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity.

1.1.333 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to establish a clear distance threshold beyond which major effects cease, yet empirical analysis reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This finding emerges from a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3, underscoring a systematic limitation in the evaluation approach that directly influences the classification of potential impacts.

Further examination of the applicant's documentation corroborates the significant role that distance plays in these judgements. For example, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. Similarly, the Landscape Character synthesis delineates a gradation of impact magnitude, with High magnitude effects confined to within approximately 20 kilometres, Medium effects occurring between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes lie results in protective tests being applied to understated inputs. Consequently, the conclusions drawn from the assessment do not reliably represent the true effects that Scottish Ministers are being asked to consent to.

The applicant's submission incorporates NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual materials presented. This guidance acknowledges that printed visualisations are unable to fully replicate the true scale as perceived by a viewer on site. Consequently, any photographic or graphic representation within the assessment, including wireline drawings, must be understood as technical renderings rather than exact reproductions of the visual experience. The wireline drawings, although included within panoramic projections, share the same constraints as the accompanying photography and do not serve as independent corrections or enhancements to the visual evidence.

This recognition of the technical and perceptual constraints is critical in interpreting the visualisation materials used to support the planning assessment. It underscores the necessity of considering such evidence as indicative rather than definitive, given that the viewer's perception in the field may differ substantially from what is captured and reproduced in printed or digital formats. By acknowledging these limitations, the applicant's evidence provides a balanced and transparent framework for evaluating the visual impact, ensuring that decision-makers understand the contextual boundaries within which the visual assessment has been prepared and presented.

The applicant's evidence acknowledges that the development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the proposed 35-year operational life. This impact is not limited to the operational timeframe, as consenting to the development effectively designates this seascape as suitable for wind farm use, establishing a lasting precedent in policy terms. Such a permanent change to the night-time seascape character raises significant concerns regarding the visual and environmental effects of artificial lighting in an area hitherto free from such illumination. Consequently, careful consideration must be given to the implications of this alteration in the context of seascape protection and planning policy.

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.334 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets does not comply with the established methodology required for such evaluations, thereby undermining the reliability of its conclusions regarding heritage impacts. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and requires an assessment of whether the integrity of

that setting is adequately retained, the methodology explicitly states that visual change should not be equated directly with adverse impact.

An independent Methodological Audit, based solely on the applicant's Appendix 14.3, reveals that although the operational assessment identifies relevant heritage attributes and describes visual change factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate the critical evaluative step of assessing the integrity of the setting as prescribed by the methodology. The Audit highlights that this essential analytical process is absent in all the examined worked examples, calling into question the validity of the applicant's conclusion that the integrity of setting is adequately retained.

The applicant's assessment risks underrepresenting the true cultural significance of the heritage assets by focusing predominantly on fixed viewpoints rather than the broader experiential qualities integral to their value. Their own baseline acknowledges that the significance arises from a combination of factors including pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These elements are inherently experienced dynamically, through movement, rather than from static observation points. Historic Environment Scotland has highlighted this limitation in their consultation responses recorded within the application, specifically requesting additional viewpoints to ensure these wider qualities are adequately captured. Without fully addressing these experiential and relational aspects, the assessment may fail to reflect the heritage assets' cultural significance in a comprehensive manner. Consequently, it is essential that the assessment methodology is expanded to incorporate these broader landscape and movement-based experiences to provide a more accurate and meaningful evaluation of heritage impacts.

The heritage impact conclusions presented in the proposal are closely linked to the findings of the accompanying landscape assessment. It is important to consider that any mitigation measures proposed rely fundamentally on the accuracy and comprehensiveness of the landscape evaluation. When landscape effects are minimised or understated, as has been identified, the proposed mitigation may not adequately address the full scope of potential harm.

This reliance raises significant concerns because the heritage conclusions effectively inherit the deficiencies present in the landscape assessment. If the latter underestimates the visual or environmental impacts, the resulting heritage assessment will similarly understate the potential adverse effects on historic assets. This interconnectedness means that any shortcomings in landscape evaluation directly undermine the credibility of the heritage impact findings.

Accordingly, the robustness of the overall assessment is compromised by this dependence. Without a fully accurate and transparent landscape analysis, the conclusions regarding heritage impacts cannot be regarded as reliable. It follows that the planning authority should carefully scrutinise these linked assessments to ensure that any mitigation measures are grounded in a comprehensive understanding of the true effects.

While mitigation measures are referenced in the application, they fall short of the requirements set out in national policy for protecting heritage assets. Specifically, the proposal fails to comply with NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) related to the setting of heritage sites, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be safeguarded. Furthermore, Scottish Ministers have not been presented with the necessary assessment that such a conclusion would demand. In light of these shortcomings, the application cannot be considered compliant with the key policy requirements for heritage protection and therefore undermines its overall acceptability.

1.1.335 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic and social sustainability of the island communities by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity, and remoteness identified in the applicant's own baseline assessments. Any alteration to these attributes will therefore have an immediate and detrimental impact on the visitor economy.

This economic impact extends beyond tourism alone; it affects the broader community infrastructure. Reduced visitor numbers would inevitably lead to diminished local services and amenities, which are maintained largely through the revenue and demand generated by tourism. Consequently, the population may decline as residents move away in search of greater opportunities and improved facilities elsewhere, threatening the long-term viability of these island communities.

In summary, the proposal risks eroding the fundamental qualities that underpin the islands' economic base and social fabric. Protecting these attributes is essential to maintaining not only tourism but also the wider community and population sustainability. Therefore, the proposal should be reconsidered in light of its potential to cause significant and lasting harm to these vulnerable island communities.

The applicant's socio-economic assessment notably contrasts the detailed evaluation of potential port communities with a generalized, regional-level approach to island communities, despite acknowledging habitability as a significant pathway for impact. While mitigation measures are proposed with respect to port areas, no comparable place-based assessment or tailored mitigation is undertaken for the island communities directly affected by the development. This discrepancy undermines confidence in the adequacy of the proposed mitigation for these island populations.

Island economies, by their nature, differ markedly from regional averages. Their economic structures are heavily concentrated in sectors reliant on the unique qualities that attract visitors, making them particularly sensitive to any changes in those attributes. Contrary to this reality, the applicant's conclusion that island communities exhibit low sensitivity to tourism-related effects is reached without the

benefit of localized, place-specific analysis. Such a conclusion cannot be considered robust evidence but rather an unsubstantiated assumption.

Given these considerations, the methodology employed fails to capture the nuanced vulnerabilities of island communities, and the absence of place-based assessment leaves the true socio-economic impacts inadequately understood and potentially unaddressed. It is therefore essential that a more detailed and context-specific evaluation be undertaken to ensure that mitigation measures are appropriately targeted and effective for island populations.

The proposal fails to meet essential planning and statutory requirements for the assessment and protection of island communities, resulting in a significant risk that their interests will be inadequately considered and potentially harmed. Without a robust and comprehensive evaluation of socio-economic impacts on these communities, the decision-making process lacks a sound evidential basis, undermining the precautionary principles mandated where evidence is insufficient. This failure directly conflicts with the practical necessity of safeguarding the sustainability and wellbeing of island populations.

The applicant explicitly acknowledged that island communities warrant particular scrutiny; however, it did not undertake the necessary assessments to fully understand or mitigate the potential effects of the proposal on these communities. Consequently, it has not demonstrated that the development is compatible with the maintenance of sustainable island communities. This omission represents a serious shortfall in addressing the requirements set out in the National Marine Plan, specifically GEN 19 and paragraph 4.81, as well as the relevant provisions of NPF4 Policy 11(c).

Moreover, the statutory duties enshrined in the Islands (Scotland) Act 2018 have not been fulfilled, as there is no evidence of meaningful engagement with island communities from the inception of the proposal through to its conclusion. This lack of engagement and failure to weigh their interests appropriately is contrary to established legal and policy frameworks designed to ensure that island communities are not disproportionately impacted by development proposals. On this basis, the proposal cannot be considered compliant with the necessary planning and statutory standards and should therefore be refused.

1.1.336 Ecology, Biodiversity and Habitats Regulations

The proposed development, involving extensive construction, operation, and eventual decommissioning over several decades, would have a substantial presence within an ecologically sensitive marine environment. This environment includes Priority Marine Features and Annex I habitats located directly within the development area, indicating a high level of ecological importance. The scale and duration of the activities pose a significant risk of adverse environmental effects.

Surrounding the development site, the waters support a diverse range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for critical life processes, and disruption could lead to detrimental impacts on their populations and the wider ecosystem. The introduction of large-

scale industrial activity threatens the integrity of these habitats and the species they support.

Given the ecological sensitivity and the presence of priority conservation features, any proposal must carefully consider the potential for significant environmental harm. Mitigation measures alone may be insufficient to address the scale of impact anticipated, and the precautionary principle should guide decision-making to prevent irreversible damage to this valuable marine environment.

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

The applicant's evidence clearly establishes that under the Habitats Regulations, consent for developments potentially impacting protected habitats and species can only be granted when the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site. This requirement is absolute unless the strict derogation tests are satisfied. Crucially, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The evidential burden lies with the applicant to demonstrate this to the requisite standard. Importantly, proposals for mitigation, compensation, or future monitoring, while relevant, do not in themselves satisfy the statutory tests or guarantee lawful consent.

This legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embed the stringent requirements of the Habitats Regulations within the planning system, ensuring that developments affecting designated sites are rigorously assessed. The high evidential threshold and comprehensive policy context emphasize the necessity for applicants to provide robust, conclusive scientific evidence demonstrating no adverse impact before consent can be lawfully granted. This ensures the protection of sensitive ecological interests in accordance with statutory and policy mandates.

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.337 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment's comprehensiveness in addressing the real and tangible impacts on Islay's residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community's area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility. The assessment identifies a large geographical extent of change, encompassing approximately 21 kilometres and a turbine horizon spanning around 39 degrees. Effects at the ferry crossing between Fionnphort and Iona are specifically noted, with the overall impact described as moderate and significant.

Similarly, the west coast of Iona is acknowledged as highly sensitive, with widespread visibility of the turbines, and the applicant accepts that significant effects will be experienced by both residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of international heritage importance, with its significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as outlined in the applicant's own baseline studies. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits the understanding of the visual and heritage effects on key cultural receptors.

Community concerns further highlight the potential severity of the proposal's impacts. A household consultation on Iona found that 92 per cent of respondents object to the development, yet the applicant's assessment does not address habitability, despite its consultants recognising this as a potential pathway of effect on the local community. To illustrate the perceived scale, Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at around 33 kilometres, would be overtopped by the tallest turbines by approximately 194 metres, despite the turbines being located at roughly two-thirds of that distance. Taken together, these factors indicate that the visual, community, and heritage impacts on Iona have been significantly underestimated, compromising the accuracy of the overall environmental and social impact evaluation.

The practical consequence of the applicant's visual impact assessment is a significant underestimation of the effects on the communities and landscapes of Mull and the Ross of Mull. For example, the Ross of Mull South coastal area, assessed as having high sensitivity at distances of approximately 22 to 24 kilometres, is attributed only medium magnitude effects despite the applicant's acknowledgement of significant impacts at Erraid and on Core Paths. Notably, Fionnphort—the gateway to Iona and the primary embarkation point for visitors—is recognised by the applicant as significantly affected. This community, heavily reliant on the flow of tourists, faces direct adverse consequences that have not been adequately accounted for in the assessment.

Moreover, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, while the Loch na Keal National Scenic Area—characterised by high sensitivity at distances of 21 to 33 kilometres—is attributed no more than medium magnitude impacts. This approach extends to the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small purely on the basis of viewing distances exceeding 30 kilometres. Such distance-based reasoning overlooks the importance of these landscapes to Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers that rely on the Atlantic seascape. Crucially, none of these communities has received a place-based assessment, resulting in an incomplete understanding of the development's industrialising effect on this sensitive coastal environment.

While the applicant's assessment acknowledges some effects on designated landscapes, it significantly underestimates the extent and significance of impacts on wider seaboard National Scenic Areas and vulnerable island communities. For example, Ulva, located within the Loch na Keal National Scenic Area, experiences the full effects identified for that landscape, yet no specific assessment has been undertaken despite Ulva being a community-owned island undergoing regeneration, reliant on the very qualities of its unspoilt seascape and setting that are at risk. Similarly, Staffa—one of Europe's most renowned small islands and also within the same National Scenic Area—lies about 35 kilometres from the development, beyond the 30-kilometre range for detailed assessment requested by NatureScot. The applicant nonetheless concludes that any change at Staffa would be small and not significant, despite accepting the island's panoramic maritime qualities. The Jura National Scenic Area, assessed at a distance of roughly 28 to 32 kilometres, is assigned only a Medium to Low magnitude of effect due to perceived distance and retained landforms, yet this designation is founded on its wild, undeveloped Atlantic character, which would be compromised. The Scarba, Lunga, and Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is afforded the same limited consideration. Collectively, these assessments fail to fully recognise or address the substantial and cumulative impacts on the natural and cultural qualities of these sensitive landscapes and communities.

The applicant's Environmental Statement assesses the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes a Low magnitude of change to the proposed development's visual impact. This evaluation forms the basis for their overall conclusion on the effects experienced by this receptor.

However, Tiree's landscape character is exceptionally distinctive and sensitive, being an exceptionally low-lying island where the dominance of sea and sky defines its sense of place. The island's highest point, Ben Hynish, rises to only 141 metres, and the open oceanic horizon contributes fundamentally to its character. The introduction of turbines reaching heights of up to 335 metres would present vertical structures unprecedented in Tiree's seascape. Given this context, the applicant's conclusion of a Low magnitude of change significantly understates the true scale of impact on this sensitive receptor, rendering the overall assessment unreliable.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland

coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of the true impacts experienced by these receptors, as the assessment consistently moderates effects based solely on distance rather than on site-specific sensitivity or context.

This method fails to provide any place-based assessment for the communities living beyond this 20-kilometre threshold, despite the fact that these communities are demonstrably affected. By applying a blanket discounting of effects at this distance, the assessment overlooks meaningful environmental and social consequences, thereby undermining the integrity and comprehensiveness of the environmental evaluation process.

In conclusion, the reliance on a distance-based moderation and discounting framework leads to a significant gap in the assessment's scope and accuracy. To ensure a robust and credible environmental impact assessment, it is essential that effects on sensitive receptors beyond 20 kilometres are fully recognised and appropriately evaluated, rather than systematically diminished or ignored.

1.1.338 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The isle is of particular concern to not only the local community but to the orthodox community worldwide.

Finally, I would also ask the Scottish Ministers to consider: That these concerns should be taken into account due to their cultural and religious significance

1.1.339 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant's own evaluations acknowledge considerable impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastline. Independent examination of the applicant's documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on island communities were identified, no corresponding evaluation has been undertaken. Furthermore, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider it inappropriate to refuse outright, I request that they mandate the submission of additional environmental information and enhanced visualisations. Moreover, I advocate that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 135
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, brought forward by MachairWind Limited (ScottishPower Renewables), relate to the construction and operation of an offshore wind energy development with an installed capacity of approximately 2 gigawatts. The project envisages between 91 and 144 turbines, each reaching a blade tip height of up to 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This area lies north-west of Islay, west of Colonsay, and approximately 21 kilometres from Iona, placing it in close proximity to the southern Hebridean islands and their coastal communities.

In accordance with procedural expectations, I request that this correspondence be formally registered as an objection, that I be recognised as an objector, and that I receive notification of the determination of these applications. The grounds for objection are founded on both planning and environmental considerations, framed by the relevant statutory and policy contexts governing such developments. It is essential to emphasise that the responsibility lies entirely with the applicant to provide robust and sufficient evidence demonstrating compliance with all applicable regulatory tests. Objectors bear no obligation to substantiate contrary claims.

Upon thorough examination of the submissions and supporting evidence, it is evident that the applicant has failed to meet the requisite standards to justify approval. Consequently, for the reasons elaborated herein, I submit that consent should be withheld.

1.1.340 Legislative and Policy Framework

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This failure to provide a comprehensive environmental impact assessment undermines the ability of the determining authority to fully understand and evaluate the environmental consequences of the proposal, thereby contravening the established legal framework.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance with these regulations, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a clear conflict with the relevant legal and policy requirements. Such shortcomings must weigh decisively against the granting of consent for this development.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unequivocal, and the absence of any evidence showing that these interests have been properly assessed or integrated into the planning decision represents a significant procedural and substantive deficiency. The failure to address or even acknowledge the specific needs and circumstances of island communities constitutes an omission that directly conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. Given that where compliance has not been demonstrated, or where deficiencies and omissions exist, these matters weigh against the granting of consent, it follows that the proposal should be refused on this basis alone. In conclusion, the application does not meet the statutory requirements to consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, and therefore consent must be withheld.

1.1.341 Conflict with National Planning Framework 4 and the Development Plan

The applicant's evidence acknowledges that, in relation to terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2, the proposal would have significant adverse effects. Specifically, it would detrimentally impact the landscape, heritage assets, and community interests that these policies are designed to safeguard. This demonstrates a clear inconsistency with the relevant development plan framework. Furthermore, when considered alongside National Planning Framework 4 in its entirety, the proposal remains contrary to established planning objectives. The applicant has not provided sufficient justification to overcome these conflicts, and as such, the proposal cannot be regarded as compliant with the terrestrial development plan framework governing land-based effects.

1.1.342 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, an independent Evidence Note, which rigorously analyses the applicant's Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of the receptor's sensitivity or the extent of visibility. This pattern is corroborated by the applicant's own documents, which acknowledge the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area over 30 kilometres distant concludes that, due to viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types.

This implicit distance-based moderation of magnitude has significant implications for the reliability of the assessment outcomes. By systematically reducing the estimated magnitude of effects at distances where the most sensitive designated landscapes

are situated, the methodology effectively understates the potential impacts. Consequently, the protective tests applied within the assessment are based on these diminished inputs, leading to conclusions that do not accurately reflect the true scale of effects that the Scottish Ministers are being asked to consent. In this regard, the methodology undermines the robustness and transparency of the environmental assessment, raising substantial concerns about the validity of its findings and the adequacy of protections afforded to sensitive landscapes.

1.1.343 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to adequately capture the broader cultural landscape and experiential qualities that contribute to the significance of the affected heritage assets, which has practical implications for the accuracy and completeness of the heritage impact evaluation. According to the applicant's own baseline, the cultural significance of these assets is intrinsically linked to dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These include the relationships between monuments, spirituality, and the surrounding landscape and seascape, with their full value experienced through movement rather than static viewpoints. Despite this, Historic Environment Scotland's consultation responses—documented within the application—expressly requested additional viewpoints to ensure these wider qualities were properly represented, indicating that the original assessment was insufficient in scope. Therefore, without a comprehensive consideration of these experiential and relational aspects, the assessment risks underestimating the heritage impacts. It is essential that these broader cultural dimensions are fully integrated into the evaluation to provide an accurate and robust understanding of potential effects on heritage significance.

There remains considerable uncertainty regarding the reliability of the heritage impact conclusions presented. This uncertainty stems directly from the landscape assessment upon which those conclusions depend. If the landscape effects have been understated, as previously demonstrated, then the foundation for the heritage assessment is inherently compromised.

Given that the heritage conclusions are built upon the landscape assessment, any understatement of landscape effects necessarily results in a corresponding understatement in the heritage impacts. This interconnectedness undermines the overall credibility of the heritage conclusions and calls into question their robustness. In light of this, it is imperative that the deficiencies in the landscape assessment be addressed to ensure a more accurate and trustworthy evaluation of heritage impacts.

1.1.344 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

1.1.345 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.346 Cumulative and In-Combination Effects

The cumulative impact assessment presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment (EIA). As established, the underlying evaluations of landscape, heritage, and socio-economic effects have been shown to understate the true scale of impacts. Consequently, the

baseline from which the cumulative effects are measured is inherently reduced, reflecting an incomplete or diminished understanding of the existing environmental and social context.

This flawed baseline directly compromises the reliability of the cumulative assessment. When the combined effects of the current proposal are considered alongside other existing, consented, and foreseeable developments, the aggregated impacts are likewise underestimated. Therefore, the cumulative assessment fails to provide a robust or accurate account of the true scale of combined effects, undermining its utility for informed decision-making and potentially leading to inadequate mitigation or planning responses.

1.1.347 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation throughout that process is directly relevant. However, deficiencies in participation identified at both the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities, during which residents are continuously engaged in work throughout the visitor season and access to specialist advice is at its lowest. This stands in stark contrast to the applicant’s advantage of having had years to prepare its case, supported by substantial professional and financial resources.

National Marine Plan policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of this magnitude be afforded a realistic opportunity to engage. The conditions under which the affected communities have been expected to respond fall short of this standard. It is therefore incumbent on the Scottish Ministers to bear these shortcomings firmly in mind when considering the representations made, recognising that the consultation process as conducted undermines the legitimacy of the site-selection process.

The Environmental Impact Assessment submitted with this application is fundamentally insufficient to enable the Scottish Ministers to reach a fully informed decision. While the assessment covers a range of topics, it falls short of providing a comprehensive and reliable evidential basis. Notably, significant effects identified within the application are either inadequately investigated or assessed using methodologies that lack coherence and rigour. For instance, the landscape assessment produces outcomes based on a distance pattern not supported by its stated methodology; the heritage assessment fails to apply its own integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. These deficiencies undermine the credibility of the assessment’s conclusions.

Furthermore, the application frequently relies on future measures such as post-consent plans, monitoring programmes, and additional approvals to address gaps in the environmental information. However, such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects

must be fully understood before determination. The expectation that outstanding matters will be resolved at a later stage does not satisfy the statutory requirement for a complete and sufficient assessment at the time of decision-making.

In light of these considerations, the Scottish Ministers are compelled to determine the application solely on the evidence presently before them. Given that the applicant has not demonstrated the adequacy of the environmental information submitted, the assessment cannot be regarded as sufficient to support approval. It is therefore concluded that the Environmental Impact Assessment is inadequate for the purpose of this decision, and the application should not be granted consent on the basis of the current information.

1.1.348 Effects on Local Area

There remains considerable uncertainty regarding the full extent and significance of the visual, community, and heritage impacts on Iona arising from the proposed development. The applicant's assessment appears to underestimate these effects, thereby compromising the accuracy of the environmental and social impact evaluation. For instance, the Coastal Character assessment identifies the Sound of Iona as highly sensitive, noting a direct orientation towards the development area and extensive visibility. The turbines would span approximately 21 kilometres and cover around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Such a scale of change warrants careful scrutiny.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, the cultural and heritage implications appear insufficiently addressed. Iona's monastic landscape, of international importance, is intrinsically linked to pilgrimage and arrival by sea. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission calls into question the completeness of the heritage impact assessment.

Community concerns further highlight the potential underestimation of effects. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed. To contextualise the scale of the turbines, the largest proposed structures would exceed the height of Ben Hynish on Tiree by approximately 194 metres, despite being at roughly two-thirds of Ben Hynish's distance from Iona. Taken together, these factors suggest that the assessment does not fully reflect the scale and significance of impacts on Iona and its community.

The applicant's assessment acknowledges significant effects on several key locations around Mull and the Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort, recognising these as areas of high sensitivity and accepting medium magnitude impacts over distances of approximately 21 to 33 kilometres. However, the proposed mitigation measures appear insufficient when compared to

the scale of these acknowledged effects, particularly given the economic and community reliance on these areas. For instance, Fionnphort, as the principal gateway to Iona and the primary embarkation point for visitors, is directly linked to the flow of tourism that underpins the local economy. Despite this, there is no detailed, place-based assessment addressing the specific consequences for communities so closely tied to visitor experience.

Furthermore, the assessment's reliance on distance-based criteria to downplay the effects on more remote but sensitive landscapes, such as the Wilderness and Gribun Rocks coastal area, is problematic. Although the applicant judges the scale of change to be small at viewing distances beyond 30 kilometres, this approach fails to capture the broader visual and economic impacts on Mull's west-facing tourism economy. This economy, alongside wildlife boat operations and accommodation providers in western townships, depends heavily on the integrity of the Atlantic seascape—an environment that would be industrialised by the development. The lack of focused, place-specific evaluation for these communities undermines confidence in the assessment's conclusions and highlights the need for a more comprehensive appraisal of effects on both designated landscapes and tourism-dependent populations.

The applicant's assessment recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva's recovery is dependent on the preservation of its natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

When comparing the assessment of effects on Tiree with other instances where mitigation has been carefully considered, it becomes apparent that the applicant's evaluation significantly understates the magnitude of change. The South Tiree coastal area is classified as having High sensitivity at a distance of approximately 35 kilometres, yet the assessment assigns it a Low magnitude of change. This

discrepancy raises concerns about the reliability of the evaluation, given the known sensitivity of the landscape and its exposure to visual impacts.

Tiree's landscape character is distinctive and particularly sensitive due to its exceptionally low-lying nature. The island's defining features are the dominance of sea and sky, with the highest elevation, Ben Hynish, reaching only 141 metres. Against this backdrop, the introduction of turbines up to 335 metres tall would represent a substantial and unprecedented vertical intrusion into the seascape. Such structures would starkly contrast with the existing open oceanic horizon, fundamentally altering the visual and experiential qualities that define Tiree's landscape character.

Given these factors, concluding a Low magnitude of change for such a sensitive receptor underrepresents the true scale of impact. The assessment's understatement risks undermining the credibility of its findings and overlooks the significant implications for Tiree's landscape character. A more accurate and rigorous evaluation is necessary to ensure that the effects are properly understood and addressed in the planning process.

The applicant's assessment fails to consider significant effects on several mainland and island communities whose direct views and economic interests are closely tied to the seascape within the proposed development area. Notably, Gigha—a community-owned island renowned nationally for its regeneration—faces the development site from the east, yet the impact on its delicate community balance and economy remains unexamined. This omission undermines the thoroughness of the assessment.

Similarly, Ardnamurchan Point, the most westerly location on the British mainland, offers panoramic vistas along the Hebridean seaboard that attract visitors throughout the peninsula. These exceptional seaward views constitute receptors of a highly sensitive nature, yet the applicant's reliance on distance-based moderation in their analysis disregards their importance. The west coast of Kintyre presents a comparable case, where a sequence of communities derives its character and visitor economy from outlooks towards Islay, Jura, and the open Atlantic waters beyond. The Treshnish Isles and adjacent small islands and mainland coasts with direct views to the development area share this vulnerability.

Given the substantial roles these visual and economic connections play in defining local community identity and sustainability, the absence of their consideration in the assessment compromises its comprehensiveness and validity. A proper evaluation of these receptors is essential to ensure that potential adverse effects are appropriately understood and mitigated.

1.1.349 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal adversely affected Orthodox Monastic community on the island and being of the same Christian religion I am writing this in support of them.

Based on my own local knowledge, I also wish to highlight that: The turbines will cover a very large area of sea. They will be a huge blot on the landscape of these fragile islands. This wind farm will be 150 x bigger than the land surface of Ioana island. It wil bring no benefit to these islands of the New Hebrides. The energy generated will be exported and not used for the benefit of these islands.

Finally, I would also ask the Scottish Ministers to consider: These turbines are built at a financial cost, at a huge cost to sea, bird and marine life and will destroy the history and spirituality of these islands. The entire community has objected formally and legally. Stop the massacre of bird and marine life and allow the habitat to remain natural. Plus the energy generated will not be used as the island does not have the infrastructure to use it.

1.1.350 Further Comments

92% of the islanders on Iona have objected to this wind farm. This is a mimicry of clean energy for political reasons only. As an Orthodox Christian I support the Orthodox Monastic community and Fr Leo Alden and the rest of the locals in their fight against the installation of these turbines which will be catastrophic for nature, marine and birdlife and for the adverse impact on the psychology and spiritual well being of the people living there and on tourism as well.

1.1.351 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the applicable statutory and policy frameworks. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Furthermore, the necessary heritage assessment has not been conducted. While the presence of effects on the island communities affected by the development was identified, no formal assessment of these impacts has been undertaken. In addition, the ecological tests required under the relevant legislation remain unproven, and it is notable that only a portion of the project is currently before the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, a public inquiry should be held prior to determination, to allow a thorough examination of the issues raised in this objection. Regardless of the decision reached, it is also urged that the Ministers provide clear and explicit conclusions within their reasons, specifically addressing the effects on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 136
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by application numbers 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be registered accordingly, and that I receive notification of the final decision on these matters.

The development envisages an offshore wind farm with a generating capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines, each reaching a maximum blade tip height of 335 metres. The site lies within a Windfarm Development Area spanning some 448 square kilometres of marine territory located to the north-west of Islay and west of Colonsay. This area is situated approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal settlements of the southern Hebrides.

My objection is grounded in planning and environmental considerations framed by the applicable statutory and policy context governing these applications. It is important to note that the onus is on the applicant to provide compelling and adequate evidence to satisfy the relevant statutory tests. Those opposing the development are not obligated to demonstrate the contrary. Upon careful examination, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications should be refused consent.

1.1.352 Legislative and Policy Framework

The marine licence application under consideration raises significant uncertainty regarding its compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010. This legislation mandates that authorisation decisions must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The application’s conformity with this overarching legal framework is therefore a fundamental prerequisite for its lawful determination.

A detailed examination of the application against the National Marine Plan’s General Policies reveals notable deficiencies. The policies of particular relevance include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The application fails to demonstrate compliance with these policies adequately, leaving critical aspects of the statutory assessment incomplete or unsupported by robust evidence.

Given these unresolved issues, the application does not meet the necessary legal and policy standards required for consent. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of the marine licence. Accordingly, the application should be

refused on the grounds that it fails to satisfy the statutory criteria established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely affect these key environmental and cultural resources. The application lacks sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Similarly, there is no clear demonstration that the historic assets and places impacted by the proposal have been properly considered or safeguarded in accordance with Policy 7. Furthermore, the energy strategy fails to meet the standards required by Policy 11, undermining the framework's objectives for sustainable energy use.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a direct conflict with the applicable legal and policy framework. As established in the framework, where such conflicts and failures exist, they weigh decisively against the granting of consent. Therefore, the proposal's failure to meet these essential policy requirements necessitates refusal in accordance with the statutory and policy context governing this application.

The application must be refused because it fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment as set out in law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the applicant is required to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. This statutory obligation has not been fulfilled, as the evidence demonstrates that the environmental impact assessment is inadequate and incomplete.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not provide sufficient evidence to demonstrate compliance with these requirements. There are significant deficiencies and omissions in the habitats regulations assessment, leaving the potential impacts on protected sites unquantified and unmitigated.

Where compliance with these legal frameworks has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these failures must weigh decisively against the granting of consent. In this case, the absence of a robust and compliant environmental impact assessment and habitats regulations assessment constitutes a fundamental procedural and evidential defect that precludes lawful approval of the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement explicitly obliges decision-makers

to ensure that the interests of island communities are given due weight during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal standards set out in the Act.

Furthermore, the evidence before the determining authority reveals clear deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a direct conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with statutory duties is not demonstrated, and where material shortcomings are evident, these factors must weigh decisively against the granting of planning consent. Consequently, the proposal should be refused on the grounds that it does not meet the statutory requirements for the proper consideration of island communities.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to demonstrate compliance with all applicable requirements. Where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given these shortcomings, the application does not meet the necessary evidential standards and should be refused.

1.1.353 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in subsections (c), (d), and (e). The proposal under consideration fails to meet these essential criteria, as the adverse impacts it would generate cannot be effectively mitigated to the standard required by the policy. Unlike proposals that demonstrate robust measures to safeguard cultural heritage, ecological integrity, and community well-being, this development lacks convincing evidence of sufficient mitigation to offset its significant negative effects.

Specifically, the proposal would result in substantial harm to nationally designated landscapes and seascapes, undermining their value and character. Furthermore, there is an absence of demonstrated protection for the cultural significance of scheduled monuments and their settings, raising serious concerns about heritage preservation. The proposal also falls short of ensuring the safeguarding of island communities, a key consideration under Policy 11. Finally, the ecological assessments submitted do not establish that the necessary environmental tests can be met, leaving unresolved risks to biodiversity. Taken together, these deficiencies amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby

undermining the policy's intended support for renewable energy development in this instance.

There remains considerable uncertainty regarding the proposal's compliance with several key policies within the National Planning Framework 4 that are designed to safeguard nationally important environmental and cultural assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which aim to protect National Scenic Areas and other nationally significant landscapes from substantial adverse effects that would undermine their designated qualities. Additionally, Policy 7, including provision 7(h) addressing scheduled monuments and 7(c) and 7(d) concerning the settings of historic assets, alongside Policy 3 on biodiversity, establish a comprehensive regime of protection that the proposal must satisfy.

Upon careful consideration, it is clear that the proposal conflicts with these policies in multiple respects. The evidence demonstrates that significant adverse effects would be inflicted upon nationally designated landscapes and seascapes. Furthermore, there is a lack of satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be secured. Equally, the ecological criteria set out under Policy 3 have not been shown to be met based on the submitted evidence. Taken together, these failures indicate that the proposal does not accord with the relevant NPF4 policies protecting designated assets and therefore should not be supported.

1.1.354 Seascape, Landscape and Visual Effects

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that stakeholders and decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified

effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.355 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the accuracy and reliability of the heritage impact conclusions derived from it. The assessment of heritage impacts is not an isolated exercise; it is fundamentally dependent on the landscape analysis that precedes it. If the landscape effects are understated, as has been demonstrated, then the heritage conclusions that are built upon this flawed foundation must also be considered understated and potentially misleading. This interdependence means that deficiencies in the landscape assessment undermine the overall credibility of the heritage impact findings. Consequently, without a robust and accurate landscape assessment, the heritage conclusions cannot be relied upon to fully reflect the true extent of impacts, and this must be taken into account in the decision-making process.

The application fails to demonstrate compliance with NPF4 Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) regarding their setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided the necessary assessment to show that the cultural significance of internationally and nationally important heritage assets and their settings would be safeguarded. Consequently, the Scottish Ministers lack the evidence required to conclude that these heritage assets would be protected. On this basis, the proposal does not meet key policy requirements for heritage protection and should therefore be refused.

1.1.356 Effects on Island Communities, Tourism and the Local Economy

The proposed development presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn specifically by the very qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation upon which these communities depend. Such an impact would extend beyond immediate economic concerns, jeopardising local services, resident populations and the long-term viability of these island

communities. It is therefore essential to consider carefully how this proposal could erode the very factors that sustain these unique and vulnerable places.

The applicant's own consultants acknowledged that habitability could represent a significant pathway through which the proposed development might impact island communities. Despite this recognition, no specific assessment of the habitability of the islands likely to be affected was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, providing detailed consideration of potential port communities but neglecting a comparable, place-based examination of the island communities facing the development. Notwithstanding this omission, the assessment asserts that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without the necessary granular analysis.

This approach fundamentally misconstrues the nature of small island economies, which are not adequately represented by regional averages. Such economies tend to be concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Moreover, dependence on increasing visitor numbers serves not to mitigate sensitivity but rather to intensify reliance on the very qualities that may be threatened by the proposal. Consequently, the conclusion that island communities possess low sensitivity to tourism impacts is not supported by robust evidence but rests on an unsubstantiated assumption. This flaw undermines the reliability of the socio-economic assessment and calls into question its capacity to fully understand or mitigate potential adverse effects on island communities.

The proposal fails to meet essential planning and statutory requirements for the assessment and protection of island communities, resulting in a significant risk that their interests will be inadequately considered and potentially harmed. Without a robust and comprehensive evaluation of socio-economic impacts on these communities, the decision-making process lacks a sound evidential basis, undermining the precautionary principles mandated where evidence is insufficient. This failure directly conflicts with the practical necessity of safeguarding the sustainability and wellbeing of island populations.

The applicant explicitly acknowledged that island communities warrant particular scrutiny; however, it did not undertake the necessary assessments to fully understand or mitigate the potential effects of the proposal on these communities. Consequently, it has not demonstrated that the development is compatible with the maintenance of sustainable island communities. This omission represents a serious shortfall in addressing the requirements set out in the National Marine Plan, specifically GEN 19 and paragraph 4.81, as well as the relevant provisions of NPF4 Policy 11(c).

Moreover, the statutory duties enshrined in the Islands (Scotland) Act 2018 have not been fulfilled, as there is no evidence of meaningful engagement with island communities from the inception of the proposal through to its conclusion. This lack of engagement and failure to weigh their interests appropriately is contrary to established legal and policy frameworks designed to ensure that island communities are not disproportionately impacted by development proposals. On this basis, the

proposal cannot be considered compliant with the necessary planning and statutory standards and should therefore be refused.

1.1.357 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ability of the proposed development to satisfy the rigorous legal and policy requirements that govern consent where protected habitats and species may be affected. Under the Habitats Regulations, consent may only be granted if the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This evidential standard is exacting and non-negotiable; any reasonable scientific doubt must preclude consent unless the strict derogation tests are unequivocally met.

It is important to emphasise that the burden of proof lies squarely with the applicant. Proposals for mitigation, compensation, or future monitoring measures, while potentially helpful, do not in themselves suffice to demonstrate compliance with the statutory tests. Therefore, reliance on such measures cannot substitute for the absence of reasonable scientific doubt concerning adverse effects on the protected habitats. This legal framework is further reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f), all of which collectively establish a stringent policy context for decision-making.

Given the above, any assessment of the development's compliance with the Habitats Regulations and associated policy must proceed with caution and rigorous scrutiny. Without clear and convincing evidence that the statutory tests are met beyond reasonable doubt, the proposal cannot lawfully be granted consent. This representation therefore serves to underline the critical importance of satisfying these high evidential standards at the earliest stage of the planning process.

The applicant's submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty regarding the potential impacts on these ecological features, undermining the applicant's position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.358 Public Engagement, Site Selection and Environmental Information

The consultation process for the site-selection has been fundamentally compromised by deficiencies in public participation, directly affecting the legitimacy of the entire exercise. The applicant requests Scottish Ministers to place significant weight on the site-selection process; however, this process has been marred by inadequate engagement at both the plan and site-selection stages, persisting into the current application phase. Notably, the application documentation consists of many thousands of pages of technical material. The consultation period occurred during the busiest months of the year for island communities, when residents are fully occupied by continuous work throughout the visitor season and access to specialist advice is at its lowest. In stark contrast, the applicant has benefitted from years of preparation supported by substantial professional and financial resources, creating a substantial imbalance in the ability to engage meaningfully.

National planning policy, specifically GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected by decisions of this scale must have a realistic and fair opportunity to participate. The conditions imposed on the affected communities in this instance fall significantly short of these standards. This failure undermines the integrity of the decision-making process, and it is requested that Ministers give careful consideration to this deficiency when evaluating the representations submitted.

There remains significant uncertainty as to whether the environmental information provided is sufficient for the Scottish Ministers to make a fully informed decision on this application. Although the Environmental Impact Assessment (EIA) is extensive, its adequacy is questionable. The application identifies potential significant effects but fails to investigate them comprehensively or applies methodologies inconsistently. For example, the landscape assessment relies on distance-based outcomes not supported by its own methodology; the heritage assessment does not properly apply its stated integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals does not satisfy the EIA Regulations' requirement that likely significant effects must be understood before determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved later. On this basis, the applicant has not demonstrated that the environmental information submitted is adequate, and the application should not be approved in its present form.

1.1.359 Effects on Local Area

The applicant's assessment significantly underestimates the scale and importance of the visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the proposed development area and extensive visibility. The geographical extent of change is large, affecting the ferry crossing between Fionnphort and Iona, and resulting in an overall effect classified as moderate and significant. The turbines would be visible across approximately 21 kilometres and span around 39 degrees of the horizon. Similarly, the west coast of Iona is also

highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point. Iona's monastic landscape, which includes internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives significance from pilgrimage, arrival by sea, and movement through the landscape—factors recognised in the applicant's own baseline. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide a visualisation from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential effect pathway for the community, which remains unassessed. To provide context on the perceived scale of the turbines, the largest proposed would exceed the height of Ben Hynish on Tiree—an established landmark 141 metres tall and visible from Iona at approximately 33 kilometres—by approximately 194 metres, while situated at roughly two-thirds of that distance. Taken together, these findings demonstrate that the applicant's evaluation fails to fully capture the extent and significance of impacts on Iona.

The applicant's assessment of the impacts on designated landscapes and island communities appears to underestimate the significance of effects on key areas, particularly when compared to the mitigating considerations they present. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is intrinsically linked to the preservation of its unspoilt seascape and setting—qualities central to the designated landscape and yet entirely absent from the assessment. Despite this, the applicant has made no evaluation of the potential effects on Ulva's natural and cultural environment, thus neglecting a vital element of landscape and community protection. Similarly, Staffa, also within the same National Scenic Area and recognised as one of Europe's most celebrated small islands, lies roughly 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres within which NatureScot requested that effects on National Scenic Area qualities be assessed. While the applicant concedes that Staffa possesses panoramic maritime qualities, they conclude that the scale of change would be small and the effect not significant—an assessment that appears inconsistent with the acknowledged value of Staffa's landscape attributes.

A comparable approach is taken with other designated landscapes such as the Jura National Scenic Area, located about 28 to 32 kilometres from the development site. Here, the applicant rates the area as having High sensitivity but assigns only Medium to Low magnitude of effect, justifying this by citing distance, apparent scale, and retained landforms. This reasoning is at odds with the foundational basis of Jura's designation, which emphasises its wild and undeveloped Atlantic character—an attribute likely to be compromised by even moderate alterations. The Scarba, Lunga and Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment. In all these cases, the applicant's conclusions appear to downplay the potential for significant adverse effects on the qualities that underpin these designated landscapes and their associated communities. Such underestimation risks undermining the protection intended for these sensitive environments and the vulnerable island populations that depend upon them.

1.1.360 Personal Observations

In addition to the planning matters above, I am personally concerned because: I spend a significant amount of time on Iona every year. My brother and his family live there permanently and run Iona Craft Shop and Iona Wool, and I am part of the shareholder group that owns the St Columba Hotel. Both businesses rely on tourism, as does pretty much everyone on Iona. Amongst the population of 170, I genuinely cannot think of any household that isn't either wholly or partially reliant on tourism, apart from schoolteacher and households consisting solely of retired people.

The primary school on the island depends on there being families with children resident on Iona, and there are already concerns that the numbers for the next few years are looking low. If you give consent to this proposal, it will that destroy the key draw that drives the tourism, and thereby take away the key driver of employment on the island. No-one will be able to make or continue their lives here without employment. Scottish Ministers have a duty to consider the wider picture, and the devastating impact that Machair Wind would have on such remote island communities cannot be overstated. It is wholly unacceptable for SPR to assert that they've been unable to assess socio-economic impact because Iona is too small, and then apply data from a wholly different locality. My strong suspicion is that they are aware of just how vital tourism is to Iona, and that a genuine assessment of socio-economic impact would not help their cause, so found a convenient excuse to avoid one.

Based on my own local knowledge, I also wish to highlight that: There are two main draws for visitors - the Abbey and other monuments, and the sense of peace and tranquillity on the island. For some people, those two things are very much interlinked. Much of the business for St Columba Hotel and the Argyll Hotel, the other hotel on the island, comes from repeat guests who come regularly either on an organised retreat-type holiday, or simply return as individuals to take a break from the pressures of life - particularly city living - and experience the wildness and remoteness of the island.

When travel bloggers post on social media about Iona, their videos and pictures consistently generate hundreds of comments from people who attest to the unique quality for the place, often calling it a 'special place', their favourite place, or a place where they have found peace. If Scottish Ministers allow the setting of Iona to be so fundamentally changed, if when visitors who board the ferry at Fionnphort do not enjoy that sense of travelling to somewhere remote, seeing the island and the Abbey ahead, but only the sea and horizon everywhere else, people will not experience the place in the same way. I am pro-renewables, but I cannot see the sense in allowing such a massive development, with turbines taller than any currently in place in the UK and in a location which will make them visible not just from Colonsay but from several other islands. Legislation requires that such projects are to be permitted only when the benefit outweighs the harm, and the harm in this case has not even been properly investigated or assessed, let alone been evidenced to be outweighed by the supposed benefit.

Finally, I would urge the Scottish Ministers to consider the following:

The National Trust objection outlines the specific consideration that should be given to Iona, Staffa and the Treshnish isles, and this must be given due weight and consideration.

There has been inadequate assessment of the risks to marine mammals in these waters, and I urge Scottish Ministers to consider carefully the arguments outlined in the objection submitted by The Hebridean Whale and Dolphin Trust.

I know the RSPB have been given an extension to allow them to fully consider the impact on birds, including the very rare and highly protected Corncrake, which currently breeds on Iona and whose migration path is in exactly the area of the proposed array.

I am also concerned that the proposed siting of the array could impede Coastgard and Air Ambulance services, surely not advisable over such a large area.

Your duty is to the Scottish people and the land we call home. Many across the country and internationally will ask: if this proposal is given the go-ahead, with a devastating impact on one of our most internationally renowned tourist destinations, a landscape which has remained unchanged for centuries, is nothing sacred? What message does that send about the level of care and consideration Scottish Ministers have for the people and places they are tasked with protecting?

Ministers do not have sufficient information to allow them to grant approval to this proposal. The Environmental Impact Assessment is inadequate, as is the assessment of Socio-Economic Impact. The collisions drawn by SPR cannot be relied upon because they have drawn those conclusions from assumptions rather than concrete evidence. SPR’s sole concern appears to be their profit margin, and corporate greed and extractive practices cannot be allowed to ride roughshod over Scotland’s people and places, particularly in fragile communities such as these and when we already generate more electricity from wind power than we can absorb via the grid. This seems to me to be little more than a net zero box ticking exercise for the Scottish Government, and a very lucrative business opportunity for SPR and its Spanish parent company.

What was the point of the monks of Iona defeating the Vikings all those centuries ago if the government of the land now agrees to let a foreign multinational invade these waters and use this seascape for their own gain?

1.1.361 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluations acknowledge significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, while the effects on the island communities directly affected were identified but never subject to proper evaluation. Furthermore, the ecological criteria required by law

have not been demonstrated as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for approval.

Given these substantial shortcomings, I urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm and the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of additional environmental information and enhanced visualisations to address the deficiencies identified. Moreover, I propose that the applications be determined only following a public inquiry, which would allow for thorough examination of the issues raised in this objection.

Finally, irrespective of the decision reached, I ask the Ministers to provide clear and explicit conclusions in their reasons regarding the effects on cultural heritage and the impacted island communities. This transparency is essential to ensure that these critical considerations are properly acknowledged in the final determination.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 137
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, operating under ScottishPower Renewables. I request that this correspondence be recorded as a formal objection, that my status as an objector be acknowledged, and that I receive notification of the final determinations regarding these applications.

The project under consideration involves the construction of an offshore wind facility with an estimated capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 turbines, each reaching a maximum blade tip height of 335 metres. The proposed site encompasses a Windfarm Development Area extending over roughly 448 square kilometres of marine environment situated to the north-west of Islay and to the west of Colonsay, approximately 21 kilometres from Iona. This location is notably proximate to the islands and coastal settlements of the southern Hebrides.

My objection is founded on both planning and environmental grounds, which are elaborated upon below with direct reference to the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies firmly with the applicant to provide adequate evidence demonstrating compliance with all relevant tests and criteria. The role of objectors is not to prove the contrary but to highlight deficiencies or shortcomings in the applicant’s submissions. Having carefully considered the materials presented, it is clear that the applicant has failed to meet this evidential burden. Accordingly, I submit that the applications should be refused consent.

1.1.362 Legislative and Policy Framework

The marine licence application under consideration raises significant uncertainty due to its failure to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Authorisation decisions must be made in accordance with this Plan unless other relevant considerations indicate otherwise. The application must therefore be assessed against the General Policies, including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The evidence before the determining authority does not establish that these policies have been met. Where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, these factors must weigh against the granting of consent. On this basis, the application should be refused.

The proposal fails to demonstrate compliance with the mitigation requirements and policy objectives set out in National Planning Framework 4 (NPF4), specifically in

relation to biodiversity, natural places, historic assets, and energy. This failure to meet the standards established by NPF4 policies significantly undermines the acceptability of the development.

National Planning Framework 4 is a significant material consideration that must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, notably Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). Each of these policies imposes clear obligations to protect and enhance environmental and heritage assets while ensuring sustainable energy use.

The submitted evidence does not demonstrate compliance with these policies. There are identifiable deficiencies and omissions in the proposal's approach to biodiversity protection under Policy 3, with no adequate measures shown to safeguard or enhance local habitats and species. Similarly, under Policy 4, the proposal fails to respect or maintain the integrity of natural places, lacking sufficient assessment or mitigation of impacts on the natural environment.

Regarding historic assets, Policy 7 requires careful consideration and protection of heritage sites and their settings. The proposal does not provide convincing evidence that it will avoid harm to historic assets or that any harm would be justified or appropriately mitigated. This omission conflicts with the statutory duties to preserve historic environment interests.

Finally, Policy 11 on energy mandates that developments contribute to sustainable energy objectives. The proposal does not adequately address these requirements, falling short of demonstrating how energy use and generation will align with the policy's aims.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the proposal's failure to satisfy the requirements of NPF4 Policies 3, 4, 7, and 11, it is contrary to the statutory and policy framework and should be refused planning permission.

The application fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment, rendering the proposal legally deficient and unsuitable for consent. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory obligation to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. This procedural prerequisite has not been fulfilled, as the submission lacks adequate evidence demonstrating such comprehensive assessment.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The application does not provide sufficient information or analysis to satisfy these requirements, leaving the potential impacts on protected habitats unexamined

and unmitigated. This omission constitutes a direct conflict with the legal framework governing habitat protection.

Where compliance with these statutory duties has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. Given the absence of a proper environmental impact assessment and habitats regulations assessment, the proposal fails to meet essential legal standards and should therefore be refused.

The Islands (Scotland) Act 2018 mandates that the interests of island communities must be considered and accorded due weight in the decision-making process. In this case, the proposal fails to demonstrate compliance with this statutory requirement. The evidence shows clear deficiencies and omissions in addressing the specific needs and circumstances of island communities, resulting in a failure to properly consider and weigh their interests as required by the Act. Such shortcomings constitute a conflict with the applicable legal and policy framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and where evidence identifies these material deficiencies, the weight of the law directs that consent should not be granted. Therefore, on the basis of the proposal's failure to meet the statutory obligations under the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is an established principle that the onus lies squarely with the applicant to provide clear and comprehensive proof that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence falls short of meeting this evidential burden.

The absence of such demonstrable compliance is not a mere procedural oversight but a substantive deficiency that directly undermines the legitimacy of the application. Where the applicant has not shown, beyond doubt, that all legal and policy frameworks have been adhered to, the planning authority must regard these shortcomings as material considerations weighing decisively against the grant of consent. The evidence presented does not dispel uncertainties nor address omissions; rather, it highlights conflicts with the established statutory and policy regime.

Given these failures, the application cannot be considered to have met the necessary legal and policy thresholds. The lack of adequate evidence to prove compliance constitutes a clear and compelling reason to refuse planning permission. In conclusion, the applicant's inability to satisfy the evidential requirements mandated by law and policy renders the proposal unacceptable and justifies its rejection.

1.1.363 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. While the policy expressly supports renewable energy development, such support is contingent upon adherence to specific impact tests, notably those concerning effects on communities and the environment. This conditional approach means that renewable energy initiatives must operate within the parameters established by Policy 11, rather than overriding them.

Careful examination reveals that the proposal fails to satisfy these crucial policy requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, which are afforded strong protection under Policy 11(d) and 11(e). Furthermore, the cultural significance of scheduled monuments and their settings has not been demonstrated to be preserved, raising concerns under Policy 11(c) regarding impacts on communities. The potential harm to island communities has also not been adequately addressed or safeguarded against.

Moreover, the ecological tests embedded within Policy 11 have not been shown to be met based on the evidence submitted. This further undermines the proposal's compliance with the policy and calls into question the overall appropriateness of the development in its current form. Given these substantial uncertainties and conflicts, it is clear that the proposal does not align with the impact criteria fundamental to NPF4 Policy 11.

In considering the proposal alongside the relevant National Planning Framework 4 policies, it is evident that the mitigation measures fall short when compared to the stringent protections afforded to designated assets. Policy 11 works in conjunction with Policy 4(c) and 4(d), which collectively safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policies 7 and 3 provide further protection for scheduled monuments, their settings, and biodiversity, setting a high threshold for demonstration of safeguarding cultural and ecological values.

The evidence presented indicates that the proposal conflicts with these policies in several material respects. There would be significant adverse effects on nationally designated landscapes and seascapes, an outcome directly at odds with the protections under Policy 4. Furthermore, the application fails to demonstrate that the cultural significance of scheduled monuments and their settings would be adequately protected in accordance with Policy 7(h), 7(c), and 7(d). The safeguarding of island communities, a consideration implicit within these policies, has also not been shown to be addressed satisfactorily.

Ecologically, the proposal does not meet the required tests set out under Policy 3. The submitted evidence does not confirm that the ecological impacts can be adequately mitigated or compensated for, thus failing to demonstrate compliance with the biodiversity protections integral to the NPF4. Taken together, these deficiencies underline that the proposal does not accord with the suite of policies designed to protect nationally important landscapes, heritage assets, and biodiversity.

The proposal would result in adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. This direct conflict with the policies designed to protect these aspects demonstrates that the development is inconsistent with the relevant land-based planning framework. In addition, the proposal fails to align with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to overcome these conflicts or to justify departure from the established policy protections. In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework and national planning policies, and therefore cannot be supported.

1.1.364 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, an independently prepared Evidence Note, which analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or visibility extent. This pattern is further substantiated by the applicant's own documentation, which acknowledges distance as a critical factor in effect judgements. For example, a coastal area situated over 30 kilometres away is assessed with a scale of change judged as small due to viewing distance, while the Landscape Character synthesis identifies High magnitude effects within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This implicit distance-based moderation in effect magnitude has significant implications for the reliability of the assessment's conclusions. By systematically reducing magnitude ratings at distances coinciding with the locations of the most sensitive designated landscapes, the methodology inherently understates potential impacts. Consequently, the protective tests applied by decision-makers are based on inputs that do not fully capture the extent of change experienced by these sensitive receptors. This methodological approach undermines confidence in the assessment's ability to accurately describe the effects for which Scottish Ministers are being asked to grant consent.

When considering the visual impact of the proposed development, it is essential to weigh the mitigation measures against the inherent limitations of the visualisation materials presented. While mitigation strategies may be designed to reduce visual intrusion, the supporting visual evidence, including printed visualisations and wireline drawings, must be critically evaluated for their accuracy and reliability. The applicant's reliance on NatureScot's visualisation guidance acknowledges that printed visualisations are unable to fully replicate the scale and spatial perception experienced by a viewer in the field. Consequently, any assessment based on these materials should be tempered by an understanding that the visualisations may underrepresent or distort the true visual impact, thereby limiting the effectiveness of the proposed mitigation as demonstrated in the submitted evidence.

Furthermore, the wireline drawings, which are incorporated within the same panoramic projections as the photographs, share the inherent limitations of the photographic images they accompany. These drawings are technical renderings intended to supplement the visualisations but do not function as independent or corrective tools to address the shortcomings of the photographic material. This means that the visual impact assessment cannot rely solely on these materials to accurately convey the scale and prominence of the development within the landscape. The combined limitations of these visualisation tools highlight the need for a cautious and critical interpretation of the evidence, recognising that the true visual effects may be more significant than the materials suggest.

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area's nocturnal character during the lifetime of the project.

Furthermore, it is important to recognise that the 35-year operational period does not mitigate the policy implications of this harm. A decision to consent to this development would effectively constitute an endorsement of the seascape's suitability for wind farm use, thereby accepting the associated changes to its night-time character. This acceptance carries enduring consequences beyond the temporal span of the project, as it sets a precedent for the permissible impact on the seascape in policy terms. Consequently, the introduction of night-time lighting should be carefully considered within the broader context of seascape character and planning policy to ensure that irreversible harm is not overlooked.

The applicant's evidence acknowledges that the proposed development's effects engage several key policies, specifically National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These provisions are expressly designed to safeguard nationally important landscape and seascape interests, thereby establishing a clear policy framework against which the proposal must be assessed.

However, the applicant has failed to demonstrate that its conclusions regarding the scale of these acknowledged effects align with the methodology it has employed. This shortcoming undermines the reliability of its assessments and, critically, means that the proposal does not evidence compliance with the relevant planning policies protecting nationally important landscapes and seascapes. On this basis, the development cannot be considered consistent with established policy requirements and should not be supported.

1.1.365 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the

applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond their physical presence, encompassing a range of experiential qualities. These include the historic practices of pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. Importantly, this significance is understood to be experienced dynamically, through movement rather than from static viewpoints.

However, Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that these broader cultural and experiential qualities may not be fully captured by the applicant's assessment. Specifically, the statutory body has requested the inclusion of additional viewpoints to better represent these wider aspects, which are integral to understanding the heritage assets' true significance.

While the applicant has established a baseline that recognises the multifaceted nature of the cultural landscape, there remains some uncertainty as to whether the assessment comprehensively addresses the intangible and experiential values that contribute to the heritage assets' significance. Ensuring that these qualities are adequately considered is essential for a balanced and thorough evaluation of potential impacts.

The practical consequence of understating landscape effects is a corresponding understatement in the heritage impact conclusions. Since these heritage conclusions rely directly on the landscape assessment, any deficiencies or minimisations within that assessment inevitably carry over, undermining the overall credibility of the heritage evaluation. This interdependence means that if the landscape effects are not fully or accurately accounted for, the subsequent heritage conclusions cannot be considered robust or reliable.

The practical consequence of the application's failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal

cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.366 Effects on Island Communities, Tourism and the Local Economy

Mitigation measures proposed in support of the development fail to adequately address the fundamental reliance of the island communities on the qualities that attract visitors. While attempts may be made to reduce direct environmental impacts, such efforts cannot compensate for the profound alteration to the landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the islands' appeal. The applicant's own baseline assessments confirm these attributes as key visitor draws, yet the proposal would inevitably diminish them in ways that cannot be fully mitigated.

This dependence is exceptional and integral to the economic and social sustainability of the island communities. Any adverse change to these visitor-attracting qualities strikes at the very economic base of these communities, undermining not only local services and employment but also population retention and overall community viability. The proposal therefore presents a significant threat to the long-term sustainability of the islands, a risk that cannot be offset by partial mitigation measures.

The practical consequence of the applicant's inadequate assessment methodology is a significant risk that the specific impacts on island communities will be neither properly understood nor effectively mitigated. Although the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, no subsequent assessment of habitability was undertaken for the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed consideration of potential port communities but failing to undertake an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that

these island communities exhibit low sensitivity to tourism effects, a finding that lacks empirical grounding.

This conclusion overlooks the distinctive economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies tend to be heavily concentrated in sectors that are particularly vulnerable to changes in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers heightens the community's vulnerability by deepening reliance on those qualities at risk. Without a place-based analysis, the claim of low sensitivity is not supported by evidence but instead rests on an unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's findings and calls into question the adequacy of any proposed measures to address potential adverse socio-economic impacts on island communities.

The applicant acknowledges that island communities warrant specific and careful consideration within the planning process. However, the evidence demonstrates a failure to undertake the necessary assessment to understand the proposal's effects on these communities. This omission runs counter to the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting marine and coastal environments be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose statutory obligations to assess and accord weight to the interests of island communities through meaningful engagement from the earliest stages of a proposal through to its conclusion.

In light of this, the proposal has not demonstrated compatibility with the sustainable development of island communities, nor has it satisfied the statutory duties owed to these populations. Without evidence that meaningful engagement has occurred or that the socio-economic impacts have been thoroughly evaluated, the decision-making process fails to align with established policy and statutory frameworks. Accordingly, the proposal cannot be considered compliant with the necessary standards for the protection and promotion of island community interests.

1.1.367 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan represents a practical acknowledgement by the applicant that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. These documents are typically prepared to address situations where an adverse effect on the integrity of a protected site cannot be ruled out, indicating that the applicant has anticipated potential ecological impacts that require mitigation under the relevant derogation provisions.

Moreover, the inclusion of these documents as part of the application is a noteworthy aspect, as it reflects the applicant's understanding that the Scottish Ministers may reach a different conclusion regarding the presence or extent of adverse effects. This approach underscores the precautionary nature of the application process in relation to protected sites and suggests that the applicant is seeking to ensure that appropriate measures are considered to compensate for any potential harm. Nevertheless, the ultimate determination of whether these measures are adequate remains with the decision-making authority.

Consent for developments affecting protected habitats and species can only be lawfully granted if the competent authority is satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This requirement means that unless the strict derogation tests set out in the Habitats Regulations are met, development permission must be refused. Applicants bear the full burden of proving compliance with these statutory tests; reliance solely on proposed mitigation, compensation measures, or future monitoring cannot by themselves demonstrate that the legal standards have been satisfied.

This legal framework is reinforced by national planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies reflect the stringent evidential and procedural requirements embedded within the Habitats Regulations, ensuring that protection of designated sites and species is paramount in decision-making processes. The policy regime demands a high level of scientific certainty before development consent can be responsibly granted.

In light of these obligations, any planning application proposing development with potential impacts on protected habitats must present robust, unambiguous evidence demonstrating no adverse effect on site integrity. Failure to meet this exacting standard must result in refusal of consent to comply with legal and policy mandates. This approach safeguards the ecological importance of protected sites and upholds the statutory framework governing habitat conservation.

The applicant’s submissions, including their own derogation documents, fall short of demonstrating that the statutory tests designed to safeguard internationally important

habitats and species are met. The evidence indicates a significant lack of certainty regarding the effectiveness of proposed mitigation measures, undermining confidence that adverse impacts can be adequately avoided or compensated.

Given this failure to satisfy the rigorous legal requirements, the application does not provide a sound basis for granting consent. Without clear and demonstrable compliance with these statutory protections, approval would be inconsistent with the necessary safeguards for internationally important ecological features.

1.1.368 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project's overall effects.

The cumulative impact assessment relies directly on the findings presented in the Environmental Impact Assessment, which itself contains understated effects within the landscape, heritage, and socio-economic evaluations. As a result, the baseline from which cumulative effects are measured is inherently reduced, leading to an underestimation of the true combined impact of the proposed development alongside existing, consented, and foreseeable projects. This flawed approach undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential adverse effects when considered collectively.

The planning application fails to comply with key policy and regulatory requirements concerning project splitting and the assessment of cumulative effects, resulting in an incomplete and potentially misleading evaluation. Specifically, the proposal does not satisfy the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e) and the stipulations of the Environmental Impact Assessment Regulations relating to project splitting. The applicant has not adequately demonstrated that the cumulative and in-combination effects of the development, including any deferred works associated with the project, have been thoroughly identified and assessed. This omission undermines the integrity of the environmental assessment and risks overlooking significant impacts that may arise when the entire scope of the project is considered collectively. Consequently, it is imperative that the decision-making process explicitly addresses how the deferred works will be treated to ensure a comprehensive and compliant evaluation. Without such clarification and assessment, the proposal remains non-compliant with established planning policies and environmental regulations.

1.1.369 Public Engagement, Site Selection and Environmental Information

The applicant's submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant's advantage, having had years to prepare the case with considerable professional and financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The environmental information presented within the application falls short of the standards required for a thorough Environmental Impact Assessment (EIA), particularly when compared to the robust evidence necessary to inform Scottish Ministers' decisions effectively. While the application does identify potential pathways to significant effects across various topics, it either fails to investigate these pathways comprehensively or relies upon methodologies that lack the rigor to substantiate the conclusions reached. For example, the landscape assessment produces outcomes based on a distance pattern absent from its own methodology, the heritage assessment does not evidence the application of its prescribed integrity test, and the socio-economic assessment omits a place-based analysis of the affected islands. Such deficiencies undermine the reliability of the environmental evidence and distinguish it unfavourably from the standards of sufficiency required by the EIA Regulations.

Furthermore, the application frequently depends on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals to address outstanding environmental concerns. This approach is incompatible with the fundamental requirement that likely significant effects must be understood before determination, as prescribed by the EIA Regulations. Scottish Ministers are obliged to base their decisions on the evidence currently before them rather than on speculative assurances that unresolved matters will be satisfactorily addressed in the future. Given that the applicant has not demonstrated that the environmental

information submitted is adequate for this purpose, it follows that the EIA as presented is insufficient to support an informed and lawful determination of the application.

1.1.370 Effects on Local Area

There is significant uncertainty surrounding the applicant's assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The development area lies immediately north-west of Islay and west of Colonsay, yet the application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay's own coastline—is central to the applicant's derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on Iona, with practical consequences for the accuracy of the environmental and social impact evaluation. The Coastal Character assessment itself attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The overall effect is considered moderate and significant, with the turbines visible across approximately 39 degrees of the horizon at a distance of around 21 kilometres. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point. These findings demonstrate that the visual impact is not only extensive but also of substantial significance to the community and visitors.

Beyond visual effects, the applicant's evaluation fails to adequately address the profound heritage and community implications for Iona. The island's internationally important monastic landscape—including the Abbey, the Nunnery, and the high crosses—is recognised for its significance in pilgrimage and arrival by sea, elements inherently connected to views and movement through the landscape. Despite Historic Environment Scotland's request for additional visualisations, including from the ferry crossing, no visualisation has been provided from key vantage points such

as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the potential effect on habitability—a pathway acknowledged by the applicant's own consultants—was never assessed. The scale of the turbines relative to familiar landmarks also underscores the visual dominance; for instance, Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres at roughly two-thirds of that distance. These considerations collectively highlight that the applicant's assessment does not fully capture the magnitude or significance of the impacts on Iona's community, heritage, and landscape.

The applicant's assessment fails to fully recognise the practical consequences for Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the embarkation point for visitors, is acknowledged to experience significant effects. However, beyond this, the communities whose livelihoods depend heavily on the flow of visitors and the integrity of the local seascape receive insufficient consideration, leaving a critical gap in understanding the development's economic and social impacts.

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, noted for its high sensitivity along 21 to 33 kilometres of coastline, is assessed only at a medium magnitude of effect. Similarly, the Ross of Mull South coastal area, despite its high sensitivity at 22 to 24 kilometres and the acceptance of significant effects at key locations such as Erraid, is downplayed by the attribution of only medium magnitude impacts. This approach underestimates the significance of changes to these designated landscapes, which are central to the character and attraction of the area.

The assessment's reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further diminishes the perceived scale of change. This overlooks the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers, depends fundamentally on the unspoiled Atlantic seascape which this development would industrialise. Crucially, no place-based assessments have been conducted for these communities, resulting in an incomplete evaluation that neglects the true extent of visual, economic, and community impacts.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its

panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's assessment acknowledges the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes the magnitude of change to be Low. This characterisation forms the basis for the evaluation of effects on Tiree's landscape. However, the assessment's attribution of Low magnitude appears inconsistent with the island's intrinsic landscape qualities.

Tiree is an exceptionally low-lying island, with its entire landscape character defined by the dominance of sea and sky. The island's highest point, Ben Hynish, reaches only 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height represents the insertion of vertical structures without precedent in Tiree's seascape. Such a scale of development would be a dominant and alien feature on an otherwise open oceanic horizon.

Consequently, the conclusion of Low magnitude change for a receptor of such exposure and sensitivity seems to significantly understate the likely effects. This understatement leads to an unreliable evaluation of the landscape impacts on Tiree, and warrants careful reconsideration to more accurately reflect the scale of visual and character change that would result.

The applicant's assessment fails to consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the applicant's distance-based visual impact mitigation approach fails to address adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic

failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant’s overall assessment.

There remains considerable uncertainty regarding the applicant’s approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect’s significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant’s methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.371 Personal Observations

In addition to the planning matters above, I am personally concerned because: This is detrimental to an entire region of Scotland and therefore all Scots by association, there is little benefit directly for Scotland as we already produce more than enough energy and as such we are being damaged indirectly twice. No foreign agency should be allowed to profit from our resources without significant community benefit which this doesn't present.

Based on my own local knowledge, I also wish to highlight that: All of the peoples of these islands.

1.1.372 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements guiding its determination. The applicant’s own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. Furthermore, published reviews of the applicant’s documentation reveal a systematic understatement of the magnitude of these effects. Crucially, the mandatory heritage assessment has not been conducted, and the consequences for the island communities affected have been identified but remain unassessed. In addition, the ecological criteria essential for approval have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these significant shortcomings, I respectfully urge the Scottish Ministers to refuse consent for this Offshore Wind Farm proposal and to reject the related marine licence application.

Should the Ministers be disinclined to refuse the applications outright, I request that they require the submission of additional environmental information and enhanced visualisations. Moreover, I propose that the determination of these applications be deferred until a public inquiry is held, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, I further ask that the Ministers provide explicit conclusions within their stated reasons concerning the impacts on both cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 138
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, pertaining to application reference numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this correspondence be acknowledged as a formal objection, that my details be recorded accordingly, and that I am kept informed of the final determination regarding these applications.

The project envisages the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres. The development is planned within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine space located to the north-west of Islay and to the west of Colonsay. This area lies approximately 21 kilometres from the island of Iona and is situated in proximity to the islands and coastal settlements of the southern Hebrides.

The following discussion outlines the grounds for objection, framed by reference to the relevant statutory and policy contexts governing the determination of these applications. It is important to emphasise that the onus lies wholly with the applicant to provide adequate evidence demonstrating that all necessary planning and environmental criteria are met. The role of objectors is not to establish contrary proof but to highlight the applicant’s failure to discharge this burden. In light of the points detailed below, it is clear that the applicant has not satisfactorily demonstrated compliance with the required tests, and therefore, the applications should be refused.

1.1.373 Legislative and Policy Framework

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application’s statutory assessment. Without such demonstration, the application cannot be considered to have met the legal threshold required for authorisation under the Marine (Scotland) Act 2010.

Furthermore, the evidence submitted reveals significant omissions and conflicts with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 undermines the credibility and reliability of the environmental and heritage assessments. The lack of adequate engagement as mandated by GEN 18 further compromises the procedural integrity of the application. Additionally, the

application does not satisfactorily address cumulative impacts as required by GEN 21, nor does it ensure the protection of the historic environment, landscape, and natural heritage in accordance with the relevant policies. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent. In light of these unresolved deficiencies and the absence of compliance with the National Marine Plan policies, the marine licence application should be refused.

The proposal fails to comply with the mandatory requirements of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any determination. This failure to provide an adequate environmental impact assessment undermines the statutory process and precludes informed decision-making.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations to assess effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance and the presence of deficiencies and omissions in the submitted evidence conflict with the legal and policy framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The applicant’s submission does not demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. The evidence confirms that where such compliance is not shown, or where deficiencies, omissions, or conflicts with the relevant legal and policy framework are identified, these factors must weigh against the granting of consent.

In this case, the proposal fails to properly consider and weigh the interests of island communities as required by the Act. There is a clear absence of evidence that the decision-making process has adequately addressed these statutory obligations. This omission constitutes a significant procedural and substantive deficiency, undermining the legality and soundness of the proposal’s assessment.

Accordingly, the failure to demonstrate compliance with the Islands (Scotland) Act 2018 and the associated evidential shortcomings weigh decisively against the approval of this application. Consent should not be granted in the absence of proper consideration and due weight being accorded to the interests of island communities as mandated by the statutory framework.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in the application, as the evidential burden rests squarely on the applicant to prove that all legal and policy frameworks have been satisfied. Without such demonstration, the application remains incomplete and cannot be properly assessed against the statutory and policy tests that govern planning decisions.

Moreover, the evidence submitted reveals clear deficiencies and omissions that directly conflict with the applicable legal and policy framework. These unresolved issues are not minor or technical but go to the heart of the statutory and policy compliance required for lawful consent. The absence of conclusive evidence to address these matters means that the application does not meet the necessary standards set out in planning law and policy, thereby undermining the legitimacy of any grant of consent.

In light of these significant evidential shortcomings and the applicant's failure to discharge the burden of proof, the application should be refused. The legal and policy framework is explicit that where compliance is not demonstrated, or where conflicts and omissions persist, these factors must weigh decisively against the granting of consent. Accordingly, the determining authority must reject the proposal on the basis that the applicant has not fulfilled its fundamental responsibility to prove compliance with all relevant legal and policy requirements.

1.1.374 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, including sections 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal fails to meet these criteria. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining their integrity. Furthermore, the evidence does not demonstrate adequate protection for the cultural significance of scheduled monuments and their settings. The safeguarding of island communities has likewise not been assured, and the ecological requirements outlined by the policy have not been satisfactorily evidenced as capable of being met. Consequently, the proposal conflicts with the impact criteria set out in NPF4 Policy 11 and cannot be supported on this basis.

The proposal's mitigation measures fall short when compared against the comprehensive safeguards established by relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be considered alongside Policy 4(c) and 4(d), which explicitly protect National Scenic Areas and nationally significant landscapes from significant adverse impacts on their defining qualities. Additionally, Policy 7, particularly 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the settings of historic assets, imposes stringent requirements to preserve cultural significance. Policy 3 further demands robust ecological safeguards. The submitted evidence does not demonstrate that the proposed mitigation would adequately prevent significant harm to these designated assets, thereby failing to meet the combined intent and standards of these policies.

In light of the evidence, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. There is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be protected in accordance with policy expectations. Furthermore, the ecological tests required under Policy 3 have not been shown to be capable of being met based on the information provided. Consequently, the proposal is in clear conflict with multiple

NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity, and therefore should not be supported.

The proposal would cause significant adverse effects on the landscape, heritage, and community interests protected by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts directly conflict with the objectives and safeguards established within these policies, which are designed to preserve the character and integrity of the area.

Such conflicts with the development plan framework are clear and unmitigated. The proposal fails to align with the statutory requirements set out by the local plan, demonstrating an inconsistency that cannot be overlooked. This incompatibility undermines the policy intent to balance development with environmental and cultural conservation.

In conclusion, the proposal is fundamentally at odds with both the Argyll and Bute Local Development Plan 2 and the broader National Planning Framework 4 when considered in its entirety. The applicant has not provided evidence to demonstrate otherwise, and therefore, the proposal should not be supported.

1.1.375 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as detailed in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nonetheless, analysis derived from the applicant's Chapter 16 and associated appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. This implicit distance influence is further evidenced by assessments of coastal areas over 30 kilometres away, where the scale of change is explicitly judged to be small due to viewing distance, and by the Landscape Character synthesis, which categorises magnitude as High within about 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond roughly 30 kilometres for certain landscape types.

Such an approach results in protective assessments being based on systematically moderated inputs at distances coinciding with the location of the most sensitive designated landscapes. Consequently, the conclusions presented do not reliably represent the true effects the Scottish Ministers are requested to consider. The absence of an explicit distance threshold in the methodology undermines the accuracy and robustness of predicted effects, raising significant concerns about the integrity of the assessment outcomes.

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent limitation means that the visualisations may underrepresent certain perceptual

effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The applicant's evidence acknowledges that the proposed development's effects engage several key policies, specifically National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These provisions are expressly designed to safeguard nationally important landscape and seascape interests, thereby establishing a clear policy framework against which the proposal must be assessed.

However, the applicant has failed to demonstrate that its conclusions regarding the scale of these acknowledged effects align with the methodology it has employed. This shortcoming undermines the reliability of its assessments and, critically, means that the proposal does not evidence compliance with the relevant planning policies protecting nationally important landscapes and seascapes. On this basis, the development cannot be considered consistent with established policy requirements and should not be supported.

1.1.376 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts adheres to Historic Environment Scotland's established methodology, which rightly distinguishes between visual

change and adverse impact on the setting of historic assets. This methodology emphasises the need to evaluate whether alterations affect the contribution that setting makes to cultural significance and to determine if the integrity of that setting is preserved. It explicitly recognises that visual alterations alone should not be equated with harm, thereby providing a nuanced framework for assessing heritage impacts.

However, a Methodological Audit, conducted independently from the applicant's Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes and describes visual changes such as visibility, distance, and screening, it fails to demonstrate the critical evaluative step required by the adopted methodology. The assessment does not show how the integrity of setting has been properly appraised against the criteria it accepts, merely concluding that it is adequately retained without substantiating this judgment. This omission undermines the reliability of the assessment's conclusions regarding heritage impacts and calls into question the robustness of the applicant's overall evaluation.

The applicant's assessment risks underrepresenting the true cultural significance of the heritage assets by focusing predominantly on fixed viewpoints rather than the broader experiential qualities integral to their value. Their own baseline acknowledges that the significance arises from a combination of factors including pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These elements are inherently experienced dynamically, through movement, rather than from static observation points. Historic Environment Scotland has highlighted this limitation in their consultation responses recorded within the application, specifically requesting additional viewpoints to ensure these wider qualities are adequately captured. Without fully addressing these experiential and relational aspects, the assessment may fail to reflect the heritage assets' cultural significance in a comprehensive manner. Consequently, it is essential that the assessment methodology is expanded to incorporate these broader landscape and movement-based experiences to provide a more accurate and meaningful evaluation of heritage impacts.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the accuracy and reliability of the heritage impact conclusions derived from it. The assessment of heritage impacts is not an isolated exercise; it is fundamentally dependent on the landscape analysis that precedes it. If the landscape effects are understated, as has been demonstrated, then the heritage conclusions that are built upon this flawed foundation must also be considered understated and potentially misleading. This interdependence means that deficiencies in the landscape assessment undermine the overall credibility of the heritage impact findings. Consequently, without a robust and accurate landscape assessment, the heritage conclusions cannot be relied upon to fully reflect the true extent of impacts, and this must be taken into account in the decision-making process.

There remains significant uncertainty regarding the application's compliance with essential policy requirements for heritage protection. Specifically, the proposal engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6

and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets, together with their settings, will be adequately protected. Crucially, Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. This lack of robust evidence undermines confidence in the application's acceptability and weighs against its approval.

1.1.377 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands' economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

Any alterations to these defining characteristics would therefore have a profound impact, striking directly at the economic base upon which these communities depend. This, in turn, threatens the broader social sustainability of the islands by undermining essential services, diminishing population retention, and ultimately compromising their continuing viability. The proposal's potential to diminish the very qualities that attract visitors must be recognised as a fundamental risk to the long-term resilience of these island communities.

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and

addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal's effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal's compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system's requirements to safeguard island communities effectively.

1.1.378 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value and sensitivity. Additionally, the surrounding waters are known to support important species such as seabirds, marine mammals, and basking sharks, underscoring the environmental significance of the site.

Introducing construction, operational, and decommissioning activities at a very large scale over several decades into this sensitive marine environment carries the potential for significant adverse environmental effects. This raises substantial concerns regarding the long-term ecological impact of the proposed development.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant indicates an acknowledgment that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it cannot be ruled out that the integrity of a protected site might be compromised. This approach underscores the applicant's recognition that the Scottish Ministers might reach a different conclusion regarding potential adverse effects, thereby necessitating these precautionary measures. The inclusion of these documents is therefore a significant aspect of the application, reflecting the applicant's attempt to address and mitigate possible impacts under the relevant derogation provisions.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not alone satisfy the stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected

habitats and species. The competent authority must be satisfied, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are fulfilled. This high evidential standard places the burden squarely on the applicant to demonstrate compliance, as partial or proposed measures cannot substitute for definitive proof. This legal framework is further reinforced by GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4, which collectively underscore the imperative for rigorous assessment and certainty prior to consent. Consequently, any planning decision must reflect this exacting threshold, ensuring that the statutory tests are met unequivocally before development proceeds.

The applicant's submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant's documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant's inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.379 Cumulative and In-Combination Effects

The evidence demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to future applications. As these elements are essential for the wind farm's operation, their exclusion from the present assessment results in the whole project's effects never being considered collectively. This fragmented approach means that significant impacts will be evaluated in subsequent consenting processes, following the principal decision, rather than in a comprehensive manner at the outset.

Such a methodology is procedurally and legally unsound, as it conflicts with the established principle upheld by the courts in Raeshaw Farms. This principle mandates that a project must be assessed in its entirety and not subdivided into smaller parts that individually appear less significant. By salami-slicing the project, the current assessment fails to provide a complete understanding of its overall environmental and planning implications, undermining the integrity of the decision-making process. Consequently, the current approach should be reconsidered to ensure a holistic evaluation of the entire project.

The mitigation measures proposed rely heavily on the cumulative impact assessment, which in turn is founded upon baseline evaluations contained within the Environmental Impact Assessment. However, these baseline assessments for

landscape, heritage, and socio-economic factors have been demonstrated to understate the extent of potential effects. Consequently, the cumulative impact assessment inherits this flawed foundation, resulting in a diminished portrayal of the combined effects arising from the proposed development alongside existing, consented, and foreseeable projects.

This reliance on an understated baseline undermines the reliability of the cumulative assessment, as the starting point fails to accurately capture the true magnitude of existing and potential impacts. Without a robust and comprehensive baseline, the cumulative effects are correspondingly underestimated, calling into question the adequacy of the proposed mitigation and the overall conclusions regarding the development's acceptability.

The applicant's submission fails to comply with the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Specifically, there is no adequate demonstration that the cumulative and in-combination effects of the proposal, nor the impacts of the project in its entirety, have been thoroughly identified or assessed. Furthermore, the approach to deferred works remains unaddressed in the application. It is therefore essential that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory obligations.

1.1.380 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers accord significant weight to the site-selection process; accordingly, the quality of public participation within that process is directly material. Evidence highlights that deficiencies in participation at both the plan and site-selection stages have persisted into the application phase. The application documentation comprises thousands of pages of technical material, and the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources to support their case.

Moreover, GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected have a realistic opportunity to engage in decisions of such magnitude. The conditions under which the affected communities have been expected to respond fall short of this standard. Therefore, Ministers are urged to bear these shortcomings firmly in mind when weighing the representations made. The inadequacies in both timing and accessibility of consultation undermine the legitimacy of the site-selection process and the broader decision-making framework.

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its

stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.381 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, placing the Atlantic-facing communities of these islands in closest proximity to the project. Despite this, the applicant's assessment treats Islay chiefly as a potential project location rather than recognising it as a discrete affected community. There is no place-based evaluation of the significant effects on Islay's setting, economy, or community life, thereby underestimating direct impacts on the island's population. For Colonsay and Oronsay, whose daily life is defined by a seaward outlook directly facing the development array, the situation is particularly acute. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline and the subject of the applicant's derogation and compensation proposals, highlights an acknowledged risk that harm to this internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same deficiencies identified in the heritage assessment, notably the inadequate consideration of its open maritime setting. Collectively, these factors demonstrate a significant underassessment of the direct and consequential effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the environmental and heritage impact evaluations presented by the applicant.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development. It identifies extensive visibility across a large geographical extent, approximately 21 kilometres, with turbines spanning about 39 degrees of the horizon. The assessment recognises moderate and significant overall effects, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is described as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors throughout much of the island, including at its highest point, Dùn Ì. These findings underscore the extensive visual intrusion that the development would impose upon Iona's landscape.

Beyond visual impacts, the applicant's baseline acknowledges the international importance of Iona's monastic heritage, including the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, such as from the ferry crossing itself; however, the applicant

failed to provide visualisations from critical vantage points like the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant did not assess habitability, despite its identification as a potential pathway of effect on the community. The perceived scale of the turbines can also be demonstrated by comparison with the familiar landmark of Ben Hynish on Tiree—141 metres high and visible from Iona at 33 kilometres—while the largest turbines would overtop Ben Hynish by approximately 194 metres at a closer distance of roughly two-thirds of that span. Taken together, these factors indicate that the applicant's assessment substantially underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes includes some acknowledgement of significant impacts; however, it falls short in fully addressing the scale and nature of these effects, particularly when compared to proposed mitigation measures. For example, while the assessment recognises significant effects at Erraid and on the Core Paths of the Ross, and concedes that Fionnphort—a vital gateway community for visitors to Iona—would experience notable impact, the overall attribution of magnitude remains moderate. This moderate attribution contrasts with the high sensitivity of these areas, suggesting that the mitigation proposed may not sufficiently account for the depth of disruption to community experience and landscape character.

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

Moreover, the assessment does not adequately address the economic and social importance of Mull's west-facing tourism economy, which relies heavily on the unspoiled Atlantic seascape that the development threatens to industrialise. Wildlife boat operations and the accommodation infrastructure within western townships are intimately connected to this environment, yet no place-based assessment has been conducted for these communities. In the absence of such detailed analysis, the full extent of harm to local livelihoods and the visitor experience remains unclear, raising concerns that the applicant's evaluation underestimates significant adverse effects. Therefore, a more thorough and sensitive approach is required to ensure that both the landscape and the communities dependent on it are properly considered in planning decisions.

The applicant's assessment significantly underestimates the impacts on designated landscapes and vulnerable island communities, resulting in inadequate protection of

their natural and cultural qualities. Notably, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting, yet the applicant has made no assessment of the effects on Ulva, overlooking a critical aspect of local recovery and sustainability.

Further, Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most renowned small islands, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested an assessment of effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that fails to fully recognise Staffa's exceptional status and sensitivity.

Similarly, the Jura National Scenic Area, situated about 28 to 32 kilometres from the site, is judged to have only medium to low magnitude effects due to distance and retained landforms, despite its designation emphasising its wild, undeveloped Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. Collectively, these assessments diminish the true scale of impact on important seaboard landscapes and island communities, thereby undermining the necessary safeguards for their distinctive environmental and cultural heritage.

The applicant's assessment significantly underestimates the impact on Tiree's distinctive landscape, resulting in an unreliable evaluation of effects. The South Tiree coastal area is identified as having High sensitivity at a distance of approximately 35 kilometres, yet the magnitude of change is attributed as Low. This assessment fails to recognise the fundamental characteristics of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall would create vertical structures unprecedented in the island's seascape. Given that Tiree's character is based on an open oceanic horizon, this scale of development would cause a far greater magnitude of change than acknowledged. Therefore, the conclusion of Low magnitude is a clear understatement for such an exposed and sensitive receptor, undermining the credibility of the applicant's assessment.

The applicant's assessment notably omits consideration of significant effects on a range of mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development area. Gigha, for example, is a community-owned island whose purchase by its residents has become emblematic of island regeneration. This community faces the development waters from the east, yet the impacts on its delicately balanced social structure and local economy remain unexamined within the applicant's documentation. This omission raises concerns about the completeness of the assessment, given Gigha's unique status and the potential for adverse consequences on its community cohesion and livelihood. Similarly, Ardnamurchan Point—recognized as the most westerly point of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the types of receptors subject to the distance-based

impact moderation the applicant employs, suggesting that the assessment underestimates or overlooks important visual and experiential effects on a key visitor destination.

In addition to these, the west coast of Kintyre comprises a series of communities whose identity, landscape character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles, together with other small islands and adjacent mainland coasts with views toward the development area, share this vulnerability. Their exclusion from a thorough assessment undermines the understanding of cumulative and indirect effects on the wider seascape and associated human receptors. Given the interconnectedness of these communities with the marine environment, the failure to evaluate their exposure and potential economic impact results in a fragmented and insufficient appraisal. Consequently, the applicant's assessment cannot be considered comprehensive, and this gap compromises the robustness of the planning evaluation process.

The applicant's approach to environmental impact assessment employs a distance-based methodology that systematically moderates and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This method contrasts with a more thorough, place-based assessment that would address the specific conditions and vulnerabilities of each affected community. By applying a generalized mitigation threshold at this distance, the assessment effectively diminishes the acknowledged magnitude of change experienced by receptors further afield, potentially overlooking meaningful impacts that warrant detailed consideration and tailored mitigation measures.

Taken together, the evidence demonstrates a consistent pattern whereby highly sensitive receptors beyond the 20-kilometre limit receive only a moderated evaluation of effects, while the communities living within these areas are not the subject of any focused, locality-specific assessment. This systematic discounting undermines the integrity of the environmental impact assessment by failing to account adequately for the lived experience and environmental sensitivities of these distant but nonetheless affected populations. Such an approach risks underestimating significant adverse effects and weakens the overall robustness and credibility of the applicant's environmental evaluation.

1.1.382 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am a permanent resident of Iona, where I live as a member of a Christian Monastery. We are all supporters of switching to clean energy source and we are not against windmills. I have great respect and admiration for what was achieved in the Small Isles, for example (on Canna or Eigg). I am in fact a supporter of a previous project to build a small windmill farm on Iona itself - a handful of windmills, much smaller, hidden from view behind the mountain, built on land (not at sea) to minimise impact on the marine life, and generating energy to the local population. This would support the local people, it would strengthen local business, it would attract more residents to the island, all without any of the horrid effects of the current proposal. My objection is not against clean energy, not against midmills per se and it is not founded on a 'not

in my backyard' attitude. My objection is aimed squarely at the current proposal, which is anything but green.

The sheer size of it will be devastating to our lives. The quality of our lives will forever be affected by the permanent presence of this sea of windmills. Our nights will be forever changed - light pollution will completely ruin the restorative darkness of our nights, which is also immensely appreciated by our guests. Beyond the immediate impact on our personal lives, we would also have to deal with the impact on our pilgrims and visitors. They all come to these islands precisely to be away from this sort of industrial development, to connect to an unspoilt natural habitat and to meditate in a spiritual setting whose strength comes from the way it integrates with the seascape. People come to visit the Abbey or St Columba's Bay, for example, but do you think they would find them equally inspiring and attractive against an industrial background?

If this project will affect the tourism business of these islands (and it is OBVIOUS that it will), the impact would be devastating for everyone: our monastic community, our neighbours, our pilgrims and visitors, even people who love and support these islands from afar. I find it beyond belief that we even have to point these things out: when these islands are already affected by depopulation, when businesses already struggle, how can a development of this size, placed in this position, affecting in such a negative way the very things on which our livelihood depends (the natural habitat, the seascape, the birds and sea mammals) even be taken into consideration?

Based on my own local knowledge, I also wish to highlight that: Wind farms - the process of their building, maintenance and use - have significant alterations in marine ecosystems and destruction of habitats for various marine species. Construction noise, particularly pile-driving activities, is harmful to human and marine mammals. The electromagnetic fields generated by undersea cables affect certain marine species, their behavior and navigation. How can something of this magnitude even be considered in the same waters and around the same islands that are considered of national and international importance in terms of their seabird populations, marine mammals and fish?

The residents on Iona been trying for years to help create habitats for corncrakes - why have we even bothered, if something like this is approved?

It is scientifically proven that wind turbines generate both audible noise and low-frequency infrasound, which can disturb marine life, particularly species that rely on sound for navigation and communication. Rotating blades will greatly increase bird fatalities, migration patterns will be altered, breeding rates will decline - all of these have been seen everywhere such projects were allowed.

For a project that claims to promote green energy, this is far from carbon-neutral. Manufacturing, transportation, installation and maintenance involve great energy consumption and significant carbon emissions in the production and transportation of steel, concrete, and composite materials for wind turbines as well as for their continuous maintenance.

Finally, I would also ask the Scottish Ministers to consider: What is the value of an Area of Outstanding Natural Beauty, or that of an area of international significance for its bird and marine life population, when they are destroyed by an industrial background? What will happen with the population of these islands which are already struggling financially? How will the unavoidable drop in tourism generated by something as out of place as this proposal affect the already struggling residents? When this added financial burden will be added, when live here becomes even more challenging that it already is, the depopulation of the islands will only get worse.

1.1.383 Further Comments

I am not against clean energy, I am not even against similar projects in the islands, but they need to be of MUCH smaller scale and built with the local population in mind, for the local population and in order to support our lives here, while also avoiding the devastating impact on the seabird population and marine life, as well as our culture, history and landscape. The current proposal serves none of the aims the Scottish Government should support. On the contrary, it goes against the things (people, landscape and values) that it should be protecting.

1.1.384 Summary

The proposal submitted fails to demonstrate compliance with the applicable statutory and policy framework governing its determination. The applicant's own evaluation acknowledges the presence of significant impacts on nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Independent scrutiny of the submitted documentation reveals that these impacts have been understated, and that the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities concerned were identified, no assessment of these impacts has been undertaken. The ecological requirements stipulated by law have not been proven to be satisfied. Additionally, the application before the Scottish Ministers addresses only a portion of the overall project.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the accompanying marine licence.

Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Moreover, I advocate that the determination of these applications be deferred until a public inquiry is held, thereby enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I seek a clear and explicit statement from the Ministers regarding their conclusions on the impacts to cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 139
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in applications 00012385 and 00012386. These applications seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been submitted by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded and that I be kept informed of the outcome of these applications.

The proposal envisages the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. This would involve installing between 91 and 144 turbines, each with a maximum blade tip height of 335 metres. The development is planned within a designated Windfarm Development Area encompassing approximately 448 square kilometres of marine space located north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from Iona and is situated in proximity to several islands and coastal settlements within the southern Hebrides.

My objection is founded upon detailed planning and environmental considerations, examined in the context of the statutory and policy framework governing the determination of these applications. It is incumbent upon the applicant to satisfy the relevant legal and policy tests through the provision of adequate evidence. The onus does not fall upon objectors to disprove the proposal. In this instance, the applicant has failed to meet that evidential requirement. Accordingly, the applications should be refused consent.

1.1.385 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed. Given these unresolved uncertainties and failures, the application conflicts with the applicable legal and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The marine licence application fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s

National Marine Plan. Authorisation decisions under this legislation must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. However, the application does not demonstrate compliance with key General Policies, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies are integral to the statutory assessment process, and the absence of demonstrated compliance undermines the lawful basis for granting consent.

Furthermore, the evidence identifies clear deficiencies and omissions in the application's adherence to the applicable legal and policy framework. Where compliance has not been demonstrated, or where conflicts with statutory requirements and National Marine Plan policies exist, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet these essential criteria means that it cannot be considered consistent with the statutory framework governing marine licensing in Scotland. Consequently, the marine licence should be refused on the grounds that the proposal does not satisfy the necessary legal and policy standards established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address critical areas including biodiversity, natural places, historic assets, and energy. The application does not provide sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Furthermore, there is a lack of clarity and completeness regarding the safeguarding of historic assets and the sustainable energy provisions required by the framework. This absence of demonstrated mitigation measures directly conflicts with the statutory duties and legislative requirements that must be applied alongside the National Planning Framework 4.

Given that compliance with these key policies has not been established, and considering the identified deficiencies and omissions within the submitted evidence, the proposal is in conflict with the applicable legal and policy framework. National Planning Framework 4 is a significant material consideration, and where such conflicts exist, they weigh decisively against the granting of consent. Therefore, the proposal should be refused on the basis that it fails to meet the essential policy requirements designed to protect biodiversity, natural places, historic assets, and energy sustainability as mandated by the National Planning Framework 4.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted. These shortcomings represent a failure to meet the legal standards established to protect the environment and European designated sites. As such, the proposal conflicts with the applicable legal and policy framework governing environmental and habitats protection.

Given the absence of adequate and compliant assessments, the proposal cannot be considered to have fulfilled the necessary statutory tests. This failure weighs decisively against the granting of consent. The application should therefore be refused on the grounds of non-compliance with mandatory environmental impact assessment and habitats regulations requirements.

The proposal under consideration fails to demonstrate adequate mitigation or compensatory measures that address the specific needs and interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to ensure that the interests of island communities are properly considered and given due weight throughout the planning process. The absence of clear evidence showing how these interests have been integrated into the proposal's design and assessment indicates a significant shortfall in compliance with this legislative duty.

Furthermore, the application documentation does not provide sufficient information or analysis to confirm that the interests of island communities have been meaningfully weighed against the potential impacts of the development. This omission constitutes a procedural deficiency that conflicts directly with the legal and policy framework established by the Islands (Scotland) Act 2018. Without demonstrable compliance, the proposal cannot be regarded as meeting the statutory tests required for consent, thereby undermining the legitimacy of the decision-making process.

In light of these deficiencies and the failure to properly consider and weigh the interests of island communities, the proposal conflicts with the applicable legal requirements. As established by the approved evidence, where such compliance is not demonstrated, these matters must weigh against the granting of consent. Therefore, the proposal should be refused on the grounds that it does not satisfy the statutory obligations under the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortfall in meeting the evidential burden necessary for lawful determination. Without such demonstration, the application remains unsupported by the essential proof required under the established legal and policy frameworks.

Moreover, the submitted evidence reveals clear deficiencies and omissions that directly conflict with applicable legal and policy standards. These unresolved conflicts and gaps in compliance are material considerations that must weigh heavily

against the granting of consent. The absence of satisfactory evidence undermines confidence in the proposal's conformity with statutory and policy obligations.

In conclusion, the applicant's inability to discharge the responsibility to demonstrate full compliance with all relevant legal and policy requirements constitutes a decisive reason to refuse consent. The evidential shortcomings identified are not minor or technical but go to the heart of lawful planning decision-making, mandating that the application be rejected.

1.1.386 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of approving the proposal is that it would fail to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. While Policy 11 endorses such projects, this endorsement is conditional upon meeting specific impact requirements, including those concerning communities, landscapes, seascapes, and other environmental receptors.

In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to Policy 11(d) and 11(e). Furthermore, the evidence submitted does not demonstrate that the cultural significance of scheduled monuments and their settings would be adequately protected, as required by Policy 11. The safeguarding of island communities has also not been convincingly established, raising concerns under Policy 11(c). Additionally, the ecological assessments have not shown that the necessary tests can be satisfied, casting doubt on the proposal's compliance with environmental protection standards.

Given these substantive conflicts with the impact criteria of NPF4 Policy 11, the proposal cannot be supported. The policy's framework clearly requires that renewable energy development must not override protections for sensitive landscapes, heritage assets, communities, and ecology. On the evidence before the planning authority, the proposal falls short of these essential requirements and should therefore be refused.

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily

demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

The applicant's evidence clearly indicates that the proposal conflicts with the terrestrial development plan framework relevant to land-based effects, including the Argyll and Bute Local Development Plan 2. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that the policies within this plan are designed to protect. These conflicts are directly attributable to the nature and location of the development, which the plan seeks to safeguard through its provisions.

Furthermore, the proposal is not only at odds with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be reconciled or mitigated. Consequently, the proposal remains inconsistent with the established development plan framework, underscoring its unsuitability in the current form.

1.1.387 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably lacks a specified distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant's Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. Furthermore, the applicant's own documentation explicitly acknowledges the influence of distance on their judgements, with examples such as a coastal area over 30 kilometres distant being assessed as experiencing only a small scale of change. Their Landscape Character synthesis further delineates High magnitude effects within roughly 20 kilometres, Medium effects between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types.

This implicit distance-based moderation of magnitude inputs has significant implications for the reliability of the assessment's conclusions. By systematically reducing the magnitude of change at distances coinciding with the location of the most sensitive designated landscapes, the protective tests are effectively applied to understated effects. Consequently, the resulting conclusions fail to provide a dependable description of the landscape and visual effects that the Scottish Ministers must consider in their decision-making process. Such methodological limitations cast doubt on the accuracy of the predicted effects and warrant careful reconsideration to ensure that the true extent of impact is comprehensively understood.

In considering the visualisations presented in support of the application, it is important to note that the mitigation measures proposed rely heavily on these materials to demonstrate their effectiveness in reducing visual impact. However, a detailed analysis reveals inherent limitations in the visual evidence that must temper reliance on such representations. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale and perception experienced by a viewer on site. This acknowledgment highlights a fundamental constraint: the visualisations serve as approximations rather than exact portrayals of the landscape effects. Moreover, the wireline drawings incorporated within the panoramic projections share these inherent limitations. As technical renderings embedded within the photographic visualisation, they do not function as independent corrections or clarifications to the imagery but rather inherit the same perceptual shortcomings. Consequently, while the visual materials provide a useful tool for assessment, their inability to fully convey the true scale and visual experience in the field means that any conclusions drawn from them should be made cautiously. In summary, the visualisation evidence, despite its utility, presents technical and perceptual limitations that reduce its capacity to serve as definitive proof of mitigation success.

When considering the impact of the proposed development on the night-time seascape, it is important first to evaluate the potential for mitigation of lighting effects. Aviation and navigation lighting, as proposed, would introduce permanent illumination to an area of sea horizon currently devoid of such lighting. This unlit character is a defining feature of the existing night-time seascape and contributes significantly to its visual and experiential qualities. Mitigation measures may reduce some direct glare or light spill, but the fundamental alteration of the seascape's character due to the presence of fixed lights cannot be fully eliminated.

The proposal would result in the continuous presence of aviation and navigation lighting over a stated operational life of 35 years. This duration, while finite, represents a substantial period during which the seascape would be irrevocably changed. It should be noted that, from a policy perspective, this temporal limit does not negate the harm caused. The decision to grant consent effectively endorses the suitability of this seascape for wind farm use, including the acceptance of lighting impacts as an inherent consequence.

In balancing these considerations, it is clear that while mitigation may lessen some adverse effects, the permanent introduction of night-time lighting fundamentally transforms the character of the seascape. This transformation carries significant weight in the planning balance, requiring careful reflection on the acceptability of such change within the wider policy context.

The applicant acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal's conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.388 Cultural Landscape, Archaeology and Historic Environment

Compared to the recognised Historic Environment Scotland methodology, which mandates a clear evaluation of how changes to setting affect the contribution setting makes to the cultural significance of historic assets and requires an explicit assessment of whether the integrity of setting is retained, the applicant's assessment falls short. While the methodology emphasises that visual change alone should not be equated with adverse impact, it nonetheless insists on an evaluative step that goes beyond merely describing visual alterations. This step is essential to ensure that conclusions about heritage impacts are founded on a robust understanding of setting's cultural significance and integrity.

However, a Methodological Audit prepared in support of community objections has demonstrated that the applicant's operational assessment does not fulfil this requirement. Although the assessment identifies relevant heritage attributes and discusses factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been evaluated in accordance with the adopted methodology. The absence of this crucial evaluative step undermines the reliability of the applicant's conclusions that the integrity of setting is adequately retained, thereby calling into question the overall validity of the heritage impact assessment.

The applicant's assessment recognises the cultural significance of the affected heritage assets as stemming from dynamic experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the interconnectedness of monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through movement rather than fixed viewpoints. However, the mitigation measures proposed appear insufficient to address the potential impacts on these broader cultural and experiential dimensions.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this inadequacy by requesting additional viewpoints to better capture and represent these wider qualities. This highlights a clear need for a more comprehensive assessment that fully encompasses the cultural landscape's intangible attributes. Without such consideration, the impact on the heritage assets may be underestimated, and the cultural significance inadequately protected.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it lack credibility. Since the heritage conclusions are explicitly dependent on the landscape assessment, any understatement of landscape effects directly translates into an

understatement of heritage effects. This linkage means that the overall assessment fails to accurately represent the true extent of harm to heritage assets.

The reliance on a flawed landscape assessment creates a cascading effect in the evaluation process. When landscape effects are understated, as demonstrated above, the heritage conclusions that build upon them inevitably inherit the same shortcomings. This results in an overall assessment that does not fully acknowledge or address the potential adverse impacts on the historic environment, thereby undermining the robustness of the planning evidence base.

In light of these concerns, it is essential that the assessment methodology and findings be revisited to ensure that landscape effects are accurately and comprehensively evaluated. Without rectifying these deficiencies, the heritage impact conclusions remain fundamentally compromised, weakening the justification for the proposed development in terms of its effects on heritage assets.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the stringent requirements set out in NPF4 Policy 7(h) regarding scheduled monuments, and Policies 7(c) and 7(d) concerning their setting, the applicant’s submission does not provide the necessary assessment or evidence to confirm that these assets will be safeguarded in accordance with these policies. Similarly, the requirements of GEN 6 and the guidance in paragraphs 4.22 to 4.23 of the National Marine Plan are not sufficiently addressed, leaving a significant gap in the protection framework that these policies and plans seek to establish.

Furthermore, the absence of a robust heritage impact assessment means that the Scottish Ministers are not in possession of the information needed to conclude that the proposal complies with the relevant heritage protection policies. Without this critical appraisal, the application cannot be considered to meet the policy tests designed to ensure the conservation of heritage assets. This deficiency undermines the acceptability of the proposal, as it fails to provide the assurances required by national planning policy and marine planning guidance for the protection of heritage interests.

1.1.389 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant’s own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

The applicant's failure to assess habitability impacts on island communities undermines the reliability of their socio-economic conclusions and risks overlooking significant adverse effects. Their own consultants acknowledged habitability as a potentially significant pathway of impact, yet no specific assessment was undertaken for the affected islands. Instead, the socio-economic evaluation in Chapter 18 is conducted at a regional scale, focusing on port communities while neglecting a place-based analysis of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding unsupported by targeted evidence.

Island economies are distinct from regional averages; they rely heavily on sectors directly tied to the qualities that attract visitors. This economic concentration heightens their vulnerability rather than mitigating it, as dependence on increasing visitor numbers intensifies sensitivity to changes in those visitor-attracting attributes. Therefore, concluding low sensitivity without a detailed, place-specific assessment is not a substantiated finding but rather an unproven assumption. This methodological flaw renders the socio-economic assessment inadequate for understanding or mitigating the proposal's impacts on island communities.

The proposal fails to meet essential planning and statutory requirements concerning island communities, resulting in an inadequate foundation for decision-making. Without sound socio-economic evidence and a precautionary approach where such evidence is absent, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, the assessment is fundamentally flawed. This deficiency undermines compliance with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which obligate meaningful engagement and careful consideration of island communities' interests throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny but did not conduct the necessary assessment to understand the potential impacts on these communities. This omission means the proposal cannot be demonstrated to be compatible with sustaining island communities, thereby failing to discharge the statutory duties owed to them. The absence of appropriate evaluation and engagement represents a significant shortcoming in the planning submission.

In light of these considerations, the proposal should not be approved as it does not satisfy the legal and policy framework designed to protect island communities. It is imperative that any development likely to affect these communities undertakes thorough assessment and meaningful engagement to ensure compliance with the relevant statutory duties and national planning policies.

1.1.390 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The practical consequence of the applicant's submission is that potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area have been acknowledged and addressed through specific derogation and compensation documents. These include a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, both directed at protecting the guillemot population within the designated site.

Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals the applicant's recognition that the proposed development may have significant environmental consequences requiring formal mitigation measures under derogation provisions. This approach demonstrates an awareness of the statutory responsibilities involved in safeguarding protected sites.

However, it is important to note that the submission of these documents does not guarantee agreement on the absence of harm. According to the applicant's own position, the Scottish Ministers may reach a different conclusion regarding the potential for adverse effects. This uncertainty underscores the need for careful scrutiny of the evidence and the adequacy of proposed compensation measures before any determination is made.

The applicant must recognise that under the Habitats Regulations, consent for development affecting protected habitats can only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This standard is exacting, requiring that no reasonable scientific doubt remains. It is the applicant's responsibility to demonstrate this, and reliance solely on mitigation, compensation measures, or future monitoring does not satisfy the statutory tests. This legal framework is stringent and non-negotiable, ensuring the highest level of protection for designated sites.

This statutory requirement is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e) and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions establish a comprehensive policy context that upholds the rigorous protections of the Habitats Regulations. Any proposal must therefore be assessed with great care to ensure full compliance with both legal and policy standards before consent can be lawfully granted.

There remains significant uncertainty as to whether the statutory tests designed to protect internationally important habitats and species can be satisfied in this case. On the evidence submitted, including the applicant's own derogation documents and

the degree of certainty they reveal, it is clear that the applicant has not demonstrated compliance with these essential legal requirements. This fundamental failing undermines the justification for granting consent and must weigh heavily against the approval of the application.

1.1.391 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. Specifically, the landscape, heritage, and socio-economic assessments underpinning the cumulative evaluation have been shown to understate the effects, as previously detailed. Consequently, the cumulative assessment is anchored to this diminished baseline, resulting in an underestimation of the combined impacts of the proposed development alongside other existing, consented, and foreseeable projects. This methodological flaw calls into question the reliability of the cumulative impact conclusions, as they do not fully capture the true extent of combined effects that would arise. Therefore, the cumulative assessment cannot be regarded as robust or comprehensive in its current form.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), alongside the requirements set out by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it is evident that the cumulative and in-combination effects of the proposed development, including those arising from the project as a whole, have not been comprehensively demonstrated or reliably assessed within the documentation provided. This omission raises concerns about the adequacy of the environmental appraisal underpinning the proposal.

In light of these shortcomings, it is imperative that the deferred works associated with the project are explicitly considered and addressed during the determination process. Failure to do so risks overlooking significant environmental impacts and undermines compliance with pertinent planning policies and regulatory requirements.

Accordingly, a thorough and transparent evaluation of all aspects of the project, including deferred elements, should be mandated to ensure a robust and policy-compliant decision-making outcome.

1.1.392 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty surrounding the adequacy of the public participation process in relation to the site-selection exercise. Given that the applicant requests Scottish Ministers to place considerable weight on this process, the quality of public engagement is a matter of direct relevance. However, deficiencies identified at both the plan and site-selection stages have persisted through to the application phase. Notably, the application itself comprises an extensive volume of technical documentation, amounting to many thousands of pages.

Compounding this complexity, the consultation period has coincided with the busiest months for island communities, during which residents are engaged continuously throughout the visitor season. This timing has limited the availability of specialist advice and placed considerable strain on those affected, while the applicant has had the advantage of years of preparation supported by substantial professional and financial resources. Such an imbalance raises questions about the fairness and accessibility of the consultation process.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must have a genuine and realistic opportunity to engage in decisions of this scale. Unfortunately, the conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers give careful consideration to these shortcomings when evaluating the representations submitted.

The Environmental Impact Assessment forms the essential evidential foundation for the Scottish Ministers' decision-making on this application. However, significant deficiencies undermine its sufficiency. Across several critical topics, the assessment identifies potential pathways to significant effects but fails either to investigate them thoroughly or to apply appropriate methodologies. For instance, the landscape assessment's conclusions rely on a distance-based pattern absent from its own stated methodology; the heritage assessment does not adequately apply its declared integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring schemes, and subsequent approvals to address unresolved issues. This approach conflicts with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be comprehensively understood prior to determination. Reliance on uncertain future measures cannot substitute for robust, complete information at this decisive stage.

In conclusion, the Scottish Ministers must base their determination on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved after consent. The applicant has not demonstrated that the

environmental information submitted meets the standard of adequacy necessary for an informed decision. Consequently, the assessment as presented is insufficient to support approval.

1.1.393 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends immediately north-west of Islay and west of Colonsay—the application primarily considers Islay from the perspective of its potential use as a project location rather than as an impacted island community in its own right. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based evaluation of how this proximity would affect their local setting, economic activities, or community life. This absence undermines the reliability of the environmental and heritage impact assessment for these islands.

For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the proposed development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird populations here cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, has not been adequately considered, particularly regarding the impact on its open maritime setting. The deficiencies previously identified in the heritage assessment are fully applicable here, further calling into question the thoroughness and accuracy of the applicant's evaluation.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and

movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment fails to adequately address the significant visual and economic impacts on Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Although the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres, it is only attributed medium magnitude effects. The applicant concedes significant effects at Erraid and on the Core Paths of the Ross, as well as on Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors. This community is directly tied to visitor flows and would therefore experience substantial consequences. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. Notably, the Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is acknowledged as highly sensitive at distances between 21 and 33 kilometres, yet is assigned only medium magnitude impacts. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are downplayed due to viewing distances exceeding 30 kilometres, despite the evident scale of change. Crucially, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, its wildlife boat operations, or the accommodation sector in its western townships, all of which depend heavily on the Atlantic seascape that the development would industrialise. This omission overlooks the practical consequence that these communities and their economic activities would be detrimentally affected by the proposed development.

The applicant's assessment recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva's recovery is dependent on the preservation of its natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe's most celebrated

small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island celebrated nationally as a symbol of island regeneration following its purchase by residents, faces the development waters directly from the east. Despite its unique social and economic context, the potential impacts on Gigha's finely balanced community and economy have not been examined, leaving a critical gap in the assessment.

Similarly, Ardnamurchan Point, the westernmost extremity of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of visual receptors that are subject to the distance-based moderation criticised in this

objection. The failure to adequately assess effects on such a prominent and sensitive viewpoint undermines the comprehensiveness of the applicant's approach.

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

The applicant's environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.394 Personal Observations

In addition to the planning matters above, I am personally concerned because: It will spoil the island

Based on my own local knowledge, I also wish to highlight that: Yes

1.1.395 Further Comments

N/a

1.1.396 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the local communities and cultural heritage of the coastal region. Furthermore, analysis of the applicant's submitted documentation reveals that these impacts have been underestimated, and a comprehensive heritage assessment, as mandated, has not been completed. While the implications for the island communities affected by the development were identified, they have not been subjected to proper assessment. Additionally, the ecological criteria necessary for approval remain unproven, and notably, only a portion of the overall project has been presented for consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that the Scottish Ministers should decline consent for the proposed offshore wind farm and refuse the corresponding marine licence. Should the Ministers decide against refusal, it is requested that they seek further environmental information and enhanced visual representations, and that the applications only be determined following a public inquiry. Such an inquiry would enable thorough examination of the concerns raised in this objection. Irrespective of the decision reached, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 140
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.397 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence confirms that the applicant has not adequately addressed these requirements nor taken reasonable steps to mitigate adverse effects arising from the proposal on these protected interests. Furthermore, the Scottish Ministers, in determining this application, are mandated to have regard to the same statutory duties. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application's consideration of these statutory obligations, constitutes a clear conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to this determination, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and

paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating adherence to these policies undermines the statutory assessment process and indicates a failure to meet the necessary legal standards.

Furthermore, the application exhibits significant deficiencies and omissions in its evidence base, which preclude a proper evaluation of the potential impacts on the marine environment and associated interests. The lack of robust and sound evidence as required by GEN 19 and paragraph 4.81 is particularly concerning, as it impairs the ability of the determining authority to make an informed decision. Additionally, the application does not sufficiently engage with the cumulative impacts as mandated by GEN 21 and paragraph 4.85, nor does it demonstrate effective engagement with stakeholders in accordance with GEN 18. These shortcomings represent procedural defects and evidential gaps that conflict with the comprehensive and precautionary approach mandated by the National Marine Plan.

Given these material failures to comply with the applicable legal and policy framework, the application cannot be considered to meet the statutory requirements for marine licence determination. The identified conflicts and omissions weigh decisively against the granting of consent. In accordance with the Marine (Scotland) Act 2010 and the National Marine Plan policies, the application should be refused on the grounds that it does not satisfy the necessary criteria for authorisation.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are engaged by this proposal. However, the evidence before the determining authority fails to demonstrate compliance with these key policies. Specifically, there are deficiencies and omissions in the applicant’s evidence that result in conflicts with the statutory duties and legislative requirements underpinning NPF4.

Policy 3 requires the protection and enhancement of biodiversity, yet the proposal does not provide sufficient evidence to show that biodiversity interests will be maintained or improved. Similarly, under Policy 4, which safeguards natural places, the application lacks the necessary assessments or measures to ensure that natural habitats and landscapes will not be adversely affected. Policy 7 mandates the conservation of historic assets and places, but the applicant has not adequately addressed the potential impacts on heritage assets, leaving a critical gap in compliance. Finally, Policy 11 on energy demands that proposals contribute positively to energy objectives within the planning framework; the submission fails to demonstrate alignment with these requirements.

Given these unresolved deficiencies and the absence of demonstrated compliance with the relevant NPF4 policies, the proposal conflicts with the applicable legal and policy framework. As established by the applicant’s own evidence, such failures weigh decisively against the granting of planning consent. Therefore, on the basis of non-compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4, this application should be refused.

The proposal fails to comply with the statutory requirements for environmental assessment, as it does not provide an adequate Environmental Impact Assessment (EIA) in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. Without this essential information, the decision-making process is fundamentally compromised, preventing a lawful and informed consent.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in line with the applicable statutory tests. The absence of a compliant Habitats Regulations Assessment means that the potential impacts on designated habitats and species have not been properly evaluated, undermining the protection afforded by these regulations and contravening legal requirements.

Given these failures to demonstrate compliance with both the Environmental Impact Assessment and Habitats Regulations, and the presence of deficiencies and omissions in the submitted evidence, the proposal conflicts with the relevant legal and policy framework. As established, such shortcomings must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of inadequate environmental and habitats assessment.

The proposal under consideration fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself, and is a critical component of the legal and policy framework governing developments affecting island areas.

A detailed examination of the submitted documentation reveals significant deficiencies and omissions in how the proposal addresses these statutory requirements. There is no substantive evidence that the interests of the relevant island communities have been adequately identified, assessed, or incorporated into the planning rationale. The absence of such consideration constitutes a failure to meet the explicit duties imposed by the Islands (Scotland) Act 2018.

Furthermore, the lack of demonstrable compliance with this legislative requirement is not a minor procedural oversight but a fundamental flaw that directly conflicts with the applicable legal framework. As established by the Act and reinforced by planning policy, where compliance cannot be shown, or where evidence highlights such deficiencies, these factors must weigh against the granting of planning consent.

In conclusion, the proposal does not satisfy the statutory duty to consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018. This failure represents a material conflict with the legal and policy framework and accordingly constitutes a compelling reason to refuse consent.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental

assessment requirements through robust, objective, and proportionate evidence. The submitted documentation does not adequately satisfy the evidential burden necessary to confirm that every applicable legal and policy framework has been met. This failure is critical, as the absence of demonstrated compliance, coupled with identified deficiencies and omissions, directly conflicts with the statutory and policy obligations governing the proposal. In accordance with established principles, such unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's inability to provide the requisite evidence of compliance, the application should be refused.

1.1.398 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

Policy 11 must be considered alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Additionally, Policy 7, including section 7(h) concerning scheduled monuments and sections 7(c) and 7(d) relating to the settings of historic assets, as well as Policy 3 on biodiversity, provide a comprehensive framework for the protection of designated assets. The proposal, however, fails to align with these policies.

Specifically, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their recognised qualities. It has not been adequately demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor that the interests of island communities would be safeguarded. Furthermore, the ecological tests mandated by Policy 3 have not been shown to be met based on the evidence

submitted. Consequently, the proposal conflicts with the relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity.

The proposal fails to provide mitigation measures sufficient to overcome the adverse effects identified in the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. The same conflicts persist, notably the detrimental impact on landscape, heritage, and community interests that these policies seek to safeguard. As a result, the proposal is inconsistent with the relevant development plan framework and National Planning Framework 4 in its entirety, a position the applicant has not successfully contested.

1.1.399 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, which critically examines the applicant's Chapter 16 and related appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This inherent reliance on distance is further corroborated by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance. The Landscape Character synthesis likewise categorises magnitude of impact as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises serious concerns regarding the robustness of the assessment's conclusions. By attenuating the perceived magnitude of change precisely where the most important receptors lie, the protective tests applied are effectively based on understated inputs. Consequently, the outcomes presented do not reliably reflect the true effects that the Scottish Ministers are being asked to consent to, thereby undermining confidence in the assessment's capacity to safeguard sensitive landscapes adequately.

The practical consequence of relying on the visualisation materials provided is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations are unable to fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers reviewing the visual materials might underestimate or misinterpret the extent to which the development would be visible and affect the surrounding landscape.

Furthermore, the wireline drawings included within the same panoramic projections are bound by the same constraints as the accompanying photographic images. These wireline drawings serve as a technical rendering within the visualisation rather than acting as an independent corrective tool to address any deficiencies in the photographic representation. Consequently, these visual aids should be regarded

with caution, as they do not provide a definitive or fully reliable depiction of the visual effects. This inherent limitation in the visual evidence advises careful consideration of on-site conditions and supplementary assessments when evaluating the visual impact of the proposal.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a previously unlit sea horizon, which will permanently alter the character of the night-time seascape throughout the 35-year operational period. This change is significant because the current unlit condition contributes to the natural seascape character, and the presence of artificial lighting will inevitably diminish this quality for the duration of the wind farm's use.

From a policy perspective, the 35-year operational life does not mitigate the harm caused; rather, consenting to the development signals that the seascape is deemed appropriate for wind farm use despite the adverse impact on its night-time character. This decision sets a precedent for the acceptability of such alterations, which must be carefully weighed against the importance of conserving the seascape’s intrinsic qualities.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the adverse effects identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite acknowledging these impacts, the applicant has not demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. This lack of methodological consistency undermines confidence in the applicant’s findings and, crucially, fails to establish that the proposal meets the stringent policy tests intended to protect these significant natural assets. Consequently, the proposal does not accord with the relevant policies and should be refused on the basis of non-compliance with the statutory framework protecting landscape and seascape interests.

1.1.400 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment purports to follow Historic Environment Scotland’s established methodology for evaluating effects on the setting of historic assets, which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant’s Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required

by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant's conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.401 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by the proposed development rely exceptionally heavily on visitor numbers, with those visitors being attracted primarily by the very qualities identified as landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not peripheral to the local economy but form its core appeal; visitors seek out these distinctive characteristics, which define the islands' unique sense of place and underpin their tourism sector. This sector, in turn, sustains a wide range of local services, supports employment, and contributes directly to the social fabric and economic resilience of the communities. Any alteration or degradation of these qualities would therefore have a direct and deleterious impact on the fundamental economic base upon which the islands depend.

Given this intrinsic link, the proposal's potential to diminish landscape, seascape, cultural heritage, tranquillity or remoteness threatens not only the immediate visitor experience but also the longer-term viability of the islands as sustainable communities. A reduction in visitor appeal would likely precipitate a decline in tourism revenue, undermining local businesses and services that are vital to residents' quality of life. This, in turn, could lead to population decline as economic opportunities diminish and community viability is compromised. The evidence thus establishes a clear and significant risk that the proposal would impact adversely on the essential qualities attracting visitors and, through that pathway, imperil the economic and social sustainability of the island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a significant risk that the impacts on island communities will be misunderstood and inadequately mitigated. Despite the identification by the applicant's own consultants that habitability represents a potentially significant pathway affecting these communities, no specific assessment of habitability on the affected islands was undertaken. Instead, Chapter 18 confines its analysis largely to regional-level considerations, focusing on port communities in detail while neglecting a place-based assessment of the island communities directly facing the proposed development. This gap results in the unsupported conclusion that these island communities possess low sensitivity to tourism effects.

Such a conclusion is fundamentally flawed because small island economies differ substantially from regional averages. Their economic structures are concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies the risk to these communities by deepening their reliance on the very attributes potentially threatened by the proposal. Without a detailed, location-specific analysis, the assertion of low sensitivity amounts to an assumption, not an evidence-based finding.

In light of these points, the socio-economic assessment as presented fails to provide an adequate or reliable basis for understanding or mitigating impacts on island communities. Any decision-making premised on such an incomplete evaluation risks overlooking critical vulnerabilities, thereby undermining effective planning and protection of these sensitive island environments. It is essential that a thorough,

place-based socio-economic assessment be undertaken to properly inform the planning process.

The proposal fails to meet the required planning and statutory standards in relation to island communities, as it does not provide the necessary assessment or mitigation measures to address their specific socio-economic circumstances. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be carefully evaluated and afforded appropriate weight, supported by meaningful engagement throughout the planning process. In this context, the proposal's lack of comprehensive assessment undermines its compliance with these policy and statutory requirements.

Moreover, the applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary evaluation to understand the potential effects on them. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Consequently, the proposal falls short of the established legal and planning frameworks designed to protect island communities, rendering it unacceptable in its current form.

1.1.402 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application therefore signals the recognition by the applicant of potential harmful impacts, while also presenting proposed mitigation measures intended to address these concerns.

However, the submission of these documents also implies an underlying uncertainty, as the applicant acknowledges that Scottish Ministers may ultimately reach a different conclusion regarding the presence or severity of adverse effects. This acknowledgement underscores the need for careful scrutiny of the proposed compensation and derogation measures to ensure they are adequate and effective in safeguarding the protected guillemot population and the integrity of the designated site.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

This strict framework is set out in the Habitats Regulations and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). These collectively establish a high threshold for consent, ensuring that developments must meet rigorous environmental safeguards before approval can be lawfully granted. Consequently, planning decisions must be informed by robust scientific evidence to uphold these protections effectively.

The application before the authority has not demonstrated compliance with the statutory tests designed to protect internationally important habitats and species. This failure is evident from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty that these legal requirements can be met. As such, the risk of harm to protected ecological features remains unacceptably high.

It is essential to recognise that these statutory protections are in place precisely to safeguard internationally significant environmental assets. The applicant's inability to satisfy these tests undermines the fundamental purpose of these safeguards. Without clear and demonstrable evidence that the statutory criteria have been fulfilled, the justification for granting consent is significantly weakened.

In conclusion, the absence of robust assurance that the statutory tests have been met means the application cannot lawfully proceed. For these reasons, the proposal should be refused to ensure the continued protection of internationally important ecological interests.

1.1.403 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that the Scottish Ministers are only considering part of the project, while critical components such as the export cable corridor and the onshore transmission works have been deferred to future applications. Without these essential elements, the wind farm cannot operate, yet their effects are excluded from the present evaluation. This fragmentation results in a piecemeal assessment that fails to capture the full scope of the project's impacts.

Legally, this approach conflicts with established principles confirmed by the courts in Raeshaw Farms. The ruling emphasises that a project must be assessed in its entirety rather than being divided into smaller parts whose individual effects may appear less significant. By deferring key components for separate consenting

processes after the principal decision, the overall environmental and planning consequences remain inadequately examined at the critical decision-making stage.

In light of these considerations, the current method of splitting the project assessment undermines both legal requirements and sound planning practice. A comprehensive and integrated evaluation of all project elements is necessary to ensure that the full range of impacts is properly understood and addressed before any approvals are granted.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

There remains significant uncertainty regarding the applicant’s compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project’s total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.404 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty as to whether the consultation process associated with this application has met the essential standards of effective public participation. The applicant invites Scottish Ministers to place significant weight on the site-selection process, yet the deficiencies in public engagement observed at both the

plan and site-selection stages have persisted into the current application phase. Given that the application comprises many thousands of pages of technical material, the scale and complexity of the documentation have further complicated meaningful engagement.

Compounding this difficulty, the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is notably limited. This timing has inevitably constrained the ability of those affected to provide considered and informed responses. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources, thereby creating an imbalance in the consultation process.

Under GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is imperative that those affected by decisions of this magnitude are afforded a realistic opportunity to participate. The conditions under which the communities have been required to respond fall short of this benchmark. It is therefore respectfully urged that Ministers bear these concerns firmly in mind when considering the representations made, recognising the potential implications for the legitimacy of the site-selection process.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.405 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant’s assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the

impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—subject to the applicant's derogation case and compensation plan. This represents a clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, and attributes these effects a Medium magnitude. Specifically,

significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough

evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share

this position. The absence of targeted assessment for these locations undermines confidence in the applicant’s conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant’s environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.406 Personal Observations

In addition to the planning matters above, I am personally concerned because: Having carefully considered the points raised in the prior questions I feel that they cover the issues re.planning well enough. My personal point of objection would be this: Why do this, why proceed with a plan that will cause untold levels of distress and destruction to the ecology, society and culture of one of the extended area. This is not merely a planning application for a windfarm, it will have repercussions across Argyll and beyond. Where will the generated power go more development will be required across the mainland to bring it to the grid? Who is the power for? Scotland, I doubt it, it's for money isn't it, but money for Scotland? I doubt it. Scotland can already produce enough power for its own needs. This is industrial colonisation to strip Scotland's natural resources because the country is seen as an easy target because of low population density and this area is regarded as "remote"

1.1.407 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, published critiques of the applicant’s documentation indicate that the extent of these impacts has been understated. Crucially, the heritage assessment required by policy has not been completed. Furthermore, although adverse effects on the island communities affected by the development were identified, no formal evaluation of these impacts has been undertaken. The ecological requirements set out by statutory tests remain unproven as capable of being satisfied. Additionally, it is important to note that only a portion of the proposed project is currently before the Scottish Ministers for consideration.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, as well as to refuse the accompanying marine licence. Should the Ministers be inclined not to refuse outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I contend that the applications

ought to be determined only following a public inquiry, allowing for comprehensive examination of the issues raised in this objection. Whatever the outcome, I also ask that the Ministers explicitly address and provide clear conclusions within their decision regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 141
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application numbers 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. I request that this objection be officially recorded, that I be acknowledged as an objector, and that I receive notification of the determinations relating to these applications.

The development under consideration entails the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would encompass between 91 and 144 turbines, each reaching a maximum blade tip height of 335 metres. The designated Windfarm Development Area spans roughly 448 square kilometres of marine environment situated northwest of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements within the southern Hebrides.

This objection is founded upon the planning and environmental grounds delineated by the relevant statutory and policy framework governing the determination of such applications. It is imperative to emphasise that the onus lies with MachairWind Limited (ScottishPower Renewables) to establish, through robust and sufficient evidence, that all applicable tests and criteria have been satisfied. Objectors bear no obligation to substantiate contrary claims. Upon careful consideration, it is apparent that the applicant has not met this evidential burden, and accordingly, the applications should be refused consent.

1.1.408 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure means that the proposal does not adequately address the legal obligations imposed on both the applicant and the Scottish Ministers in the determination process.

Furthermore, the applicant has not shown that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. The absence of such mitigation measures constitutes a significant omission and undermines the statutory requirement to minimise harm to the environment and heritage assets. This deficiency directly conflicts with the legal and policy framework governing the assessment of such developments.

Given these shortcomings, the application does not meet the necessary statutory criteria, and the evidence identifies clear conflicts with the applicable legal duties. As a result, these matters weigh decisively against the granting of consent for the proposal under Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and Scotland's National Marine Plan, as explicitly required by statute. The relevant policies within the National Marine Plan that govern this determination include, but are not limited to, General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is a mandatory component of the statutory assessment process for the application.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant National Marine Plan policies. There are identified deficiencies and omissions in the application that conflict with the applicable legal and policy framework. In particular, the application fails to provide sound evidence as required by GEN 19 and paragraph 4.81, and does not adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. Furthermore, the application does not satisfactorily engage with the requirements of GEN 18 concerning stakeholder engagement, nor does it sufficiently consider the implications for the historic environment, landscape, natural heritage, or co-existence with other marine users as set out in the respective policies.

Given these unresolved shortcomings and the absence of demonstrated compliance, the application is fundamentally deficient in meeting the statutory criteria. Such failures weigh decisively against the granting of consent under the Marine (Scotland) Act 2010 and the National Marine Plan. Therefore, the marine licence application should be refused.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are engaged by this proposal. However, the evidence before the determining authority fails to demonstrate compliance with these key policies. Specifically, there are deficiencies and omissions in the applicant's evidence that conflict with the statutory duties and legislative requirements underpinning NPF4.

Policy 3 requires robust protection and enhancement of biodiversity, yet the proposal does not provide sufficient evidence to confirm that biodiversity interests will be maintained or improved. Similarly, under Policy 4, the proposal fails to adequately safeguard natural places, with no clear demonstration that the development will avoid adverse impacts on the natural environment. Policy 7 mandates the protection of historic assets and places, but the application lacks the necessary assessment and mitigation measures to ensure these assets are preserved in accordance with the policy. Finally, Policy 11 on energy requires that developments contribute positively to energy objectives, yet the proposal does not evidence compliance with these requirements.

Given these unresolved deficiencies and the absence of demonstrated compliance with the relevant NPF4 policies, the proposal conflicts with the applicable legal and policy framework. In line with the guidance that where compliance has not been

demonstrated or where evidence identifies conflicts, such matters weigh against granting consent, this application should be refused.

The proposal must be refused because it fails to provide the required environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This statutory requirement has not been met. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence before the authority does not demonstrate compliance with these obligations. Where such compliance is absent, or where deficiencies, omissions, or conflicts with the legal and policy framework are evident, these factors must weigh decisively against granting consent. In this case, the failure to conduct and present adequate assessments constitutes a clear breach of statutory requirements and justifies refusal of the application.

The applicant's submission does not adequately demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The Act explicitly sets a legal framework to ensure that the unique circumstances and needs of island populations are properly integrated into planning assessments. However, the evidence provided fails to show that this statutory obligation has been met in the current proposal.

Furthermore, the absence of clear and thorough consideration of island community interests constitutes a significant deficiency in the application. The lack of detailed analysis or engagement with the specific impacts on island residents and their environment indicates an omission that conflicts with the applicable legal and policy framework. This failure to address the statutory requirements undermines the integrity of the decision-making process and leaves a critical gap in the assessment of the proposal's acceptability.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and that the evidence identifies clear deficiencies and omissions in relation to the statutory duty, these matters must weigh against the granting of consent. The proposal's failure to properly consider and weigh the interests of island communities is a material planning concern that should lead to refusal in accordance with the legal and policy context established by the Act.

The practical consequence of the applicant's failure to discharge the evidential burden of proof is that the application cannot be considered compliant with the relevant legal and policy requirements, thereby undermining the basis for granting planning consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers have a clear and reliable evidential foundation upon which to assess the proposal's lawfulness and policy conformity.

In this case, the applicant has not met this essential evidential standard. The submitted documentation and supporting evidence fail to establish compliance with all relevant legal and policy frameworks. There are identifiable deficiencies and omissions within the evidence presented, which have not been adequately addressed or remedied. Moreover, certain aspects of the proposal conflict with statutory duties and planning policies, as evidenced by the absence of demonstrable conformity in the applicant's submissions. These shortcomings are material and substantive, directly impacting the integrity of the planning assessment process.

The absence of comprehensive and convincing evidence to prove compliance means that the application falls short of the statutory and policy requirements that govern the planning system. As established in the approved evidence, where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. The applicant's failure to provide the necessary evidential assurance precludes the possibility of lawful approval.

In conclusion, the applicant has not fulfilled the requisite evidential burden to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment obligations. This failure constitutes a fundamental flaw in the application, which, in accordance with established legal and policy principles, necessitates refusal of planning permission.

1.1.409 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other receptors as set out in clauses (c), (d), and (e). The proposal under consideration fails to meet these criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's environmental safeguards. Furthermore, the submission does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be effectively safeguarded from negative impacts. In addition, the ecological assessments provided are insufficient to confirm that relevant environmental protections can be achieved. Collectively, these shortcomings establish that the proposal conflicts with the impact criteria integral to NPF4 Policy 11, thereby negating its intended support for renewable energy initiatives.

The applicant's evidence identifies that Policy 11 operates in conjunction with several other key policies within NPF4 aimed at safeguarding nationally important assets. Specifically, Policy 4(c) and 4(d) provide protection for National Scenic Areas and nationally significant landscapes, ensuring they are not subject to significant adverse effects on the qualities for which they are designated. Additionally, Policy 7 addresses scheduled monuments and their settings, with particular reference to parts (h), (c), and (d) of that policy. Policy 3 focuses on biodiversity conservation, setting ecological standards that developments must meet.

Upon detailed examination, the proposal in question fails to align with these protective policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental qualities that warrant their designation. Moreover, the submission has not sufficiently demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns about potential harm to heritage assets. The applicant has also not shown that the interests of island communities, which are often closely linked to their natural and historic environments, would be adequately safeguarded. Finally, the ecological requirements outlined under Policy 3 have not been convincingly addressed; the necessary tests to confirm that biodiversity impacts could be mitigated or avoided have not been met based on the evidence provided.

In conclusion, the proposal conflicts with multiple relevant NPF4 policies designed to protect designated landscapes, heritage assets, and biodiversity. This failure to comply with established safeguards indicates that the development should not be supported in its current form.

The applicant has not put forward any effective mitigation measures that would sufficiently address the adverse impacts identified on landscape, heritage, and community interests. Consequently, the proposal's effects remain unmitigated and significant, resulting in a failure to align with the protective aims of the terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2.

In light of this, the proposal stands in clear conflict with the relevant development plan framework and National Planning Framework 4 when considered in its entirety. The absence of demonstrated mitigation confirms that the proposal is inconsistent with the land-based planning policies designed to safeguard the local environment and community well-being.

1.1.410 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as detailed in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nonetheless, analysis derived from the applicant's Chapter 16 and associated appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. This implicit distance influence is further evidenced by assessments of coastal areas over 30 kilometres away, where the scale of change is explicitly judged to be small due to viewing distance, and by the Landscape Character synthesis, which categorises magnitude as High within about 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond roughly 30 kilometres for certain landscape types.

Such an approach results in protective assessments being based on systematically moderated inputs at distances coinciding with the location of the most sensitive designated landscapes. Consequently, the conclusions presented do not reliably represent the true effects the Scottish Ministers are requested to consider. The

absence of an explicit distance threshold in the methodology undermines the accuracy and robustness of predicted effects, raising significant concerns about the integrity of the assessment outcomes.

The practical consequence of relying on the visualisation materials submitted in support of the application is that they may not provide a fully accurate impression of the development's true visual impact. This stems from inherent technical and perceptual limitations recognised within NatureScot's visualisation guidance, which the applicant has adopted. Specifically, the guidance acknowledges that printed visualisations cannot replicate the scale that a viewer experiences in the field. Moreover, the wireline drawings included within the same panoramic projections are themselves constrained by the photographic basis they accompany; they function as technical renderings within the visualisation rather than as independent tools to correct or enhance the photographic depiction. Consequently, the visual evidence presented must be regarded with caution, as it cannot be relied upon to convey the full extent or character of the visual effects. This limitation should be taken into account when assessing the application's overall impact on the landscape and visual amenity.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the stated 35-year operational life. This change represents a significant departure from the existing dark and natural maritime environment, which has until now been free from such artificial illumination.

It is important to note that the 35-year operational period does not confine the extent of harm in policy terms. A decision to grant consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of the associated lighting effects. This sets a precedent for the future management and character of the area, with implications extending beyond the immediate timeframe.

Given these factors, the impact of lighting on the night-time seascape character warrants careful consideration within the planning balance. While recognising the operational requirements for safety and navigation, the permanent alteration of a previously unlit horizon raises concerns about the long-term preservation of the seascape's intrinsic qualities, which policy seeks to protect.

The applicant's assessment of the proposed development's effects on landscape and seascape interests fails to align consistently with its stated methodology, undermining the credibility of its conclusions regarding the scale of these impacts. While certain effects are acknowledged, the mitigation measures proposed do not sufficiently address the requirements set out in the relevant policies. This shortfall is particularly significant given the protections afforded to nationally important landscapes and seascapes, where robust and demonstrable mitigation is essential to meet policy objectives.

These deficiencies result in clear non-compliance with National Planning Framework 4 (NPF4) policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph

4.28 of the National Marine Plan, all of which safeguard key landscape and seascape interests. The absence of a thorough demonstration that the proposal meets these policy requirements calls into question its suitability and merits refusal on the grounds of insufficient mitigation and policy non-conformity.

1.1.411 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the applicant's adherence to the established methodology for assessing effects on the setting of historic assets, which calls into question the reliability of their conclusions about heritage impacts. While the applicant states that they have adopted Historic Environment Scotland's recognised methodology—developed through consultation and requiring an evaluation of how changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—this process is not clearly demonstrated. The methodology explicitly cautions against equating visual change directly with adverse impact. However, a published Methodological Audit, based solely on the applicant's Appendix 14.3, identifies that although the assessment acknowledges relevant heritage attributes and describes visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to show how the integrity of setting has been evaluated in line with the accepted methodology. Crucially, the necessary evaluative step that distinguishes mere description from a robust assessment of integrity is absent across all examined examples. This omission undermines confidence in the assessment's conclusions that the integrity of setting is adequately retained.

The applicant's assessment recognises the cultural significance of the affected heritage assets as stemming from dynamic experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the interconnectedness of monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through movement rather than fixed viewpoints. However, the mitigation measures proposed appear insufficient to address the potential impacts on these broader cultural and experiential dimensions.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this inadequacy by requesting additional viewpoints to better capture and represent these wider qualities. This highlights a clear need for a more comprehensive assessment that fully encompasses the cultural landscape's intangible attributes. Without such consideration, the impact on the heritage assets may be underestimated, and the cultural significance inadequately protected.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

There remains significant uncertainty as to whether the application complies with essential policies safeguarding heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Furthermore, the Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. In the absence of this critical evidence, the proposal does not meet key policy requirements for heritage protection and, therefore, cannot be considered acceptable.

1.1.412 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a clear and immediate risk to the economic foundation of the island communities, which rely heavily on visitors drawn by distinctive local qualities. The applicant’s own baseline assessments acknowledge that visitors are attracted specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness of these islands. Any alteration to these attributes would undermine the very reasons visitors choose to come.

This dependence on visitor-generated income is not merely an economic matter; it is intrinsically linked to the social fabric and viability of the communities. The local services that residents depend upon are sustained by this visitor economy. Should these qualities be diminished, a resulting decline in visitors would lead to reduced income, threatening the provision of essential services and potentially prompting population loss as livelihoods become unsustainable.

In sum, the proposal threatens to destabilise the fundamental economic and social sustainability of these island communities. Protecting the qualities that attract visitors is therefore critical to maintaining their continuing viability. Any development that compromises these key attributes risks undermining the communities’ future as living, vibrant places.

While the applicant’s assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant’s own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small

island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

The applicant acknowledges that island communities require particular scrutiny but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. This omission means that it has not demonstrated compatibility with sustainable island communities, nor shown that the statutory duties owed to them have been discharged. This failure contravenes the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where evidence is lacking. Furthermore, the proposal does not comply with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be assessed and given due weight through meaningful engagement from the outset to conclusion. Consequently, the proposal does not meet the necessary planning and statutory standards for assessing and protecting island communities.

1.1.413 Ecology, Biodiversity and Habitats Regulations

The evidence submitted by the applicant clearly identifies that the development area encompasses Priority Marine Features and Annex I habitats, demonstrating the site's high ecological value. These designated features are critical components of the marine environment, indicating habitats that are rare, sensitive, or otherwise of significant conservation importance. Moreover, the surrounding waters provide essential habitat for a variety of protected species, including seabirds, marine mammals, and the basking shark, all of which are recognised for their vulnerability and conservation status. The presence of such species and habitats within and adjacent to the development footprint underscores the intrinsic ecological sensitivity of the area and elevates the potential risk profile associated with any substantial anthropogenic disturbance.

Given the scale and duration of the proposed development, which entails construction, operation, and decommissioning activities extending over several decades, there exists a considerable potential for significant adverse environmental effects. The introduction of large-scale industrial activity into this ecologically important marine environment could disrupt habitat integrity, disturb protected species, and degrade the overall biodiversity value of the site. The prolonged nature of the development phases further amplifies the risk of cumulative and long-term impacts. Consequently, careful consideration must be given to the potential environmental consequences, and robust mitigation measures will be essential to avoid or minimise harm to these Priority Marine Features and protected species. Without such safeguards, the proposal poses a substantial threat to the conservation objectives associated with this sensitive marine ecosystem.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan reflects an acknowledgement of the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically targeting the guillemot population. These documents, by their very nature, are prepared for circumstances where it is not possible to exclude adverse impacts on the integrity of the protected site. Their inclusion in the application is therefore a critical feature, signalling that the applicant recognises uncertainties regarding the potential environmental consequences and is proposing measures intended to address these under the relevant derogation provisions.

This approach implicitly accepts that, despite proposed mitigation, there remains a risk that Scottish Ministers may reach a different conclusion concerning adverse effects on the site's integrity. The submitted derogation and compensation plans serve as a procedural safeguard to enable consideration of potential impacts and compensatory measures. However, the presence of these documents also highlights that the applicant's assessments do not definitively exclude harm, placing significant weight on the effectiveness and adequacy of the proposed compensation in any subsequent planning decision. This underscores the importance of rigorous scrutiny of both the potential adverse effects and the compensatory strategies before any consent is granted.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments affecting protected habitats and species can only be granted when it is clearly demonstrated that the proposal will not adversely affect the integrity of the protected site. This requirement imposes a high evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. It is not sufficient for an applicant to rely solely on mitigation, compensation proposals, or commitments to future monitoring as these do not, by themselves, satisfy the statutory tests necessary to lawfully grant consent.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions ensure that developments are subject to rigorous assessment and that consent decisions are made only when the strict derogation tests are conclusively met. Consequently, the burden of proof lies firmly with the applicant to provide robust, scientific evidence that the proposed development will not compromise the protected habitat's integrity before any consent can be lawfully granted.

The applicant's own derogation documents form the primary basis of the evidence submitted in support of the application. However, a careful examination of these documents reveals a significant lack of certainty regarding the satisfaction of the statutory tests that are legally required to protect internationally important habitats and species. The information provided does not adequately demonstrate that the necessary conditions for derogation have been met, raising substantial doubts about the application's compliance with these critical environmental safeguards. This evidential deficiency is particularly concerning given the stringent nature of the statutory tests designed to ensure that any adverse impacts on internationally designated ecological features are rigorously justified and mitigated.

Consequently, the failure to provide clear, convincing proof that the statutory tests can be satisfied fundamentally undermines the application's case for consent. Without meeting these legal requirements, the proposed development cannot be considered compliant with the obligations to protect internationally important ecological assets. The absence of demonstrated compliance not only contravenes statutory protections but also weakens the overall planning justification. In light of this, the application should not be granted consent until such time as the applicant can unequivocally establish that all statutory tests have been fully and satisfactorily met.

1.1.414 Cumulative and In-Combination Effects

The current application before the Scottish Ministers addresses only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, which are essential components without which the wind farm cannot function. Consequently, the environmental and planning effects of the entire development are not assessed collectively; instead, these significant elements are reserved for consideration under separate, subsequent consenting processes following the principal decision. This segmentation results in an incomplete evaluation of the project's full impact at the decision-making stage.

Such an approach conflicts with established legal principles, as emphasised in the Raeshaw Farms case, where the courts affirmed that a project must be appraised in its entirety rather than being fragmented into smaller parts whose individual effects may appear diminished. By deferring key components to later applications, the current assessment method effectively undermines comprehensive scrutiny, compromising the integrity and completeness of the planning process. This procedural flaw renders the present evaluation legally and procedurally unsound.

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of

the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.415 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process in this case to the standards set by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is evident that the conditions for public participation were significantly deficient. Those standards require that affected communities are afforded a realistic opportunity to engage meaningfully in decisions of considerable impact. In contrast, the applicant's consultation period coincided with the busiest months for island residents, who were heavily committed to continuous work throughout the visitor season, limiting their capacity to access specialist advice or fully consider the voluminous technical documentation submitted, which spans many thousands of pages. Meanwhile, the applicant has benefited from years of preparation, with extensive professional and financial resources, further skewing the participatory balance.

These shortcomings directly undermine the legitimacy of the site-selection process, particularly given the weight that Scottish Ministers are asked to place on it. The deficiencies in public engagement evident at both the plan and site-selection stages have persisted into the application stage, resulting in a process that falls short of the effective participation required by national policy and international obligations. It is therefore incumbent on Ministers to take these factors seriously when considering the representations submitted, recognising that the affected communities were not provided with a fair or practical opportunity to contribute to decisions of this magnitude.

While mitigation measures and future monitoring plans are proposed, reliance on these post-consent actions does not satisfy the fundamental requirement that likely significant environmental effects be fully understood prior to determination. The Environmental Impact Assessment submitted is the principal evidential basis for the Scottish Ministers' decision. However, the assessment falls short of sufficiency, despite its breadth. Key topics reveal significant shortcomings: the landscape assessment employs a methodology that does not support its conclusions, notably attributing outcomes to distance patterns absent from its own framework; the heritage assessment fails to demonstrate application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. By deferring critical elements to future approvals and monitoring, the applicant has not provided adequate environmental information. Consequently, the Scottish Ministers are unable to make an informed determination based on the evidence before them, as required by the EIA Regulations.

1.1.416 Effects on Local Area

There is significant uncertainty surrounding the applicant's assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The

development area lies immediately north-west of Islay and west of Colonsay, yet the application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay's own coastline—is central to the applicant's derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

The applicant's own Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment concludes a moderate and significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impacts on this heritage asset.

Community concerns further emphasise the scale of effect, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has never been assessed for this community. To contextualise the visual scale, the largest turbines would overtop Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by about 194 metres at roughly two-thirds of that distance.

Taken together, these points demonstrate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona. This undermines the accuracy of the environmental and social impact evaluation and warrants further, more rigorous assessment to fully understand and address the effects on this sensitive and internationally important locale.

While the applicant acknowledges significant effects on certain areas such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort, their assessment relies heavily on distance-based mitigation assumptions. For example, the Wilderness and Gribun Rocks coastal area is deemed to experience only small scale change due to its viewing distance exceeding 30 kilometres. This approach overlooks the fact that the Ross of Mull South coastal area, assessed as having High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude, despite the applicant's acceptance of significant impacts on key community points.

Similarly, across Mull, significant effects are admitted on Core Paths and within Local Landscape Areas including Central, South and West Mull. The Loch na Keal National Scenic Area, notable for its High sensitivity extending from 21 to 33 kilometres, is nonetheless assigned no greater than Medium magnitude. Such assessments appear inconsistent, particularly given the importance of these landscapes to local communities and the visitor experience, which the applicant recognises but does not fully translate into higher impact ratings.

Moreover, the applicant's evaluation does not sufficiently account for the economic and community implications for Mull's west-facing tourism sector. This includes wildlife boat operators and accommodation providers whose livelihoods depend on the largely unspoiled Atlantic seascape. These communities, integral to the area's character and economy, have not been subject to detailed place-based assessment, leaving a significant gap in understanding the full consequences of the proposed development on these sensitive coastal landscapes and their dependent populations.

The applicant's assessment acknowledges the proximity of Ulva within the Loch na Keal National Scenic Area and recognises the shared effects on that designated landscape. However, it fails to consider the specific circumstances of Ulva as a community-owned island undergoing regeneration. This small, re-establishing community depends fundamentally on the unspoilt qualities of its setting and seascape, yet no dedicated assessment has been made to evaluate the potential impacts on its natural and cultural environment.

Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed as experiencing only small-scale change with no significant effect. This conclusion is reached despite the island's renowned panoramic maritime qualities, which the applicant's own assessment acknowledges. Notably, this distance exceeds the approximately 30-kilometre threshold recommended by NatureScot for assessing impacts on National Scenic Area qualities, raising concerns about the adequacy of the assessment methodology.

Other designated landscapes such as the Jura National Scenic Area, situated about 28 to 32 kilometres away, are assessed as having High sensitivity but only Medium to Low magnitude of impact, primarily justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga, and the Garvellachs National Scenic Area at 35 to 40 kilometres. However, these areas' designations rest heavily on their wild and undeveloped Atlantic character, which may be more vulnerable to change than the applicant's assessment suggests. Taken together, these

considerations indicate that the potential effects on important seaboard landscapes and island communities may be underestimated, warranting a more thorough and nuanced evaluation.

The applicant's assessment acknowledges the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes the magnitude of change to be Low. This characterisation forms the basis for the evaluation of effects on Tiree's landscape. However, the assessment's attribution of Low magnitude appears inconsistent with the island's intrinsic landscape qualities.

Tiree is an exceptionally low-lying island, with its entire landscape character defined by the dominance of sea and sky. The island's highest point, Ben Hynish, reaches only 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height represents the insertion of vertical structures without precedent in Tiree's seascape. Such a scale of development would be a dominant and alien feature on an otherwise open oceanic horizon.

Consequently, the conclusion of Low magnitude change for a receptor of such exposure and sensitivity seems to significantly understate the likely effects. This understatement leads to an unreliable evaluation of the landscape impacts on Tiree, and warrants careful reconsideration to more accurately reflect the scale of visual and character change that would result.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach overlooks significant impacts on mainland and island communities that have direct visual and economic connections to the development area. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development from the east; yet, the effects on its delicate community balance and local economy have not been examined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the distance-based mitigation seeks to moderate, calling into question the adequacy of such an approach. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other small islands and mainland coasts viewing the development area, have not been fully accounted for. Taken together, these omissions indicate that the applicant's assessment lacks the necessary comprehensiveness regarding the effects on these sensitive and economically reliant communities.

The applicant's assessment systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors situated beyond approximately 20 kilometres, resulting in an underestimation of significant effects. This methodological approach is evident in the treatment of numerous locations where the environmental impact is diminished in the analysis solely due to their distance from the development, despite the sensitivity of the receptors involved.

Such a distance-based discounting fails to acknowledge the genuine and potentially substantial impacts on these distant communities. The consequence is a lack of

place-based assessment for those who live with the effects, which undermines the integrity and comprehensiveness of the environmental impact assessment. By not fully recognising the scale and significance of effects beyond the arbitrary 20-kilometre threshold, the assessment does not provide a reliable basis for decision-making.

In conclusion, the reliance on systematic moderation and discounting beyond 20 kilometres effectively marginalises the experiences of sensitive receptors and leads to an incomplete understanding of the development's true environmental consequences. For the assessment to be robust and credible, it must incorporate a more nuanced and thorough evaluation of effects regardless of distance, thereby ensuring that all affected communities are properly considered.

1.1.417 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. Moreover, published analyses of the applicant's documentation reveal that these impacts have been underestimated, and crucially, the necessary heritage assessment has not been conducted. The effects on the island communities within the project's scope were identified but have never undergone proper assessment. Additionally, the ecological criteria required to support the proposal remain unproven. Compounding these deficiencies, only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these significant shortcomings, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, along with the associated marine licence. Should the Ministers decide against refusal, it is requested that they require further environmental information and enhanced visual representations. Furthermore, the determination of the applications should be deferred until after a public inquiry, which would enable a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also requested that the Ministers explicitly address and provide clear conclusions in their reasons concerning the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 142
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These submissions, made by MachairWind Limited (ScottishPower Renewables), relate to a project involving approximately 2 gigawatts of installed capacity. The development envisions between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment north-west of Islay and west of Colonsay. The site lies about 21 kilometres from Iona and in close proximity to various islands and coastal communities of the southern Hebrides.

I request that this correspondence be officially recognised as an objection, that I be recorded as an objector, and that I receive notification upon determination of these applications.

The grounds of my objection are anchored in planning and environmental considerations, assessed within the relevant statutory and policy context governing these applications. It is imperative to acknowledge that the evidential responsibility lies entirely with the applicant to substantiate that all applicable legal and policy criteria are met. Objectors bear no obligation to prove the contrary. Upon examination of the submissions and accompanying evidence, it is clear that MachairWind Limited has failed to satisfy this burden. Consequently, the applications should be refused consent on the basis outlined herein.

1.1.418 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to establish a clear distance threshold beyond which major effects cease, yet empirical analysis reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This finding emerges from a comprehensive review of the applicant’s Chapter 16 and Appendices 16.1 to 16.3, underscoring a systematic limitation in the evaluation approach that directly influences the classification of potential impacts.

Further examination of the applicant’s documentation corroborates the significant role that distance plays in these judgements. For example, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. Similarly, the Landscape Character synthesis delineates a gradation of impact magnitude, with High magnitude effects confined to within approximately 20 kilometres, Medium effects occurring between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes lie results in protective tests being applied to understated inputs. Consequently, the conclusions drawn from

the assessment do not reliably represent the true effects that Scottish Ministers are being asked to consent to.

The applicant's visual evidence is prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

Beyond the temporal scope of the 35 years, it is also crucial to acknowledge that policy considerations do not treat this operational life as a limit on harm. The decision to grant consent for this development effectively constitutes a determination that the seascape is suitable for wind farm use, accepting the associated changes to its character. Therefore, even if mitigation could reduce some adverse effects, the permanent introduction of lighting remains a key factor in altering the night-time environment. In conclusion, the unavoidable lighting effects represent a material and lasting impact on the seascape character that must be carefully weighed in the planning balance.

The applicant's proposals fail to demonstrate adequate mitigation in relation to the significant effects identified on nationally important landscapes and seascapes. While some measures have been suggested, these are insufficient when assessed against the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The absence of robust mitigation measures undermines confidence that the proposal can appropriately safeguard the visual and environmental qualities these policies seek to protect.

Furthermore, the applicant has not substantiated that its conclusions regarding the scale of the accepted effects align with the methodology employed in its own

assessments. This lack of consistency raises serious concerns about the reliability of the environmental impact evaluation and, by extension, the proposal's compliance with key planning policies aimed at conserving nationally important landscape and seascape interests. In light of these shortcomings, the proposal does not meet the necessary policy standards and should not be supported.

1.1.419 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with that body. This methodology emphasises the need to evaluate whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is adequately retained, explicitly cautioning against equating visual change directly with adverse impact. However, a published Methodological Audit prepared in support of community objections, working solely from the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The Audit highlights that the assessment describes visual changes but does not perform the necessary evaluative step to establish whether the integrity of setting is preserved, a deficiency apparent in all examined worked examples. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the thoroughness of the applicant's assessment.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The heritage impact conclusions presented rely significantly on the findings of the landscape assessment. According to the evidence, any understatement of landscape effects directly influences and diminishes the accuracy of the heritage conclusions that are derived from them. This interdependence suggests that if the landscape assessment fails to fully capture the extent or significance of the effects, the subsequent evaluation of heritage impacts will inevitably reflect that same understatement.

This reliance raises concerns about the overall credibility of the heritage conclusions. By building upon an assessment that potentially downplays landscape effects, the heritage analysis may not adequately account for the full scope of impacts, thereby undermining its robustness. It is therefore essential that the landscape assessment be thorough and accurate, as deficiencies in this area compromise the validity of the heritage impact conclusions that depend upon it.

The application fails to demonstrate adequate protection for the cultural significance of internationally and nationally important heritage assets and their settings, a deficiency that fundamentally undermines its acceptability. Without the necessary assessment to support such a conclusion, the Scottish Ministers are left without the essential evidence to determine compliance with relevant policies.

This shortfall directly contravenes National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of heritage assets. Furthermore, the application does not satisfy the requirements of GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish the framework for safeguarding heritage interests.

In the absence of a comprehensive assessment demonstrating that these heritage assets and their settings will be preserved, the application cannot be considered compliant with established policy. Consequently, it should not be approved until such evidence is properly provided and evaluated.

1.1.420 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the potential impact of the proposed development on the fundamental qualities that attract visitors to the island communities in question. The applicant’s own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity, and remoteness as central to the visitor experience. Any alteration to these characteristics raises serious doubts about the continued appeal of the area as a destination.

These qualities are not merely aesthetic or incidental; they underpin the economic foundation of the island communities. The exceptional dependence on visitor-generated income means that changes affecting these attributes could directly undermine local businesses, employment opportunities, and the provision of essential services. This economic fragility, in turn, poses risks to the broader social fabric and demographic stability of the islands.

Consequently, the proposal threatens the long-term viability of these communities by jeopardising the very qualities upon which their sustainability relies. Given the clear linkage between the visitor-attracted characteristics and the islands’ economic and social wellbeing, careful reconsideration is necessary before any development proceeds.

In comparison to the detailed assessment of port communities, the applicant’s approach to socio-economic impacts on island communities is notably insufficient.

While the consultants acknowledged habitability as a potentially significant pathway for effects on island populations, no specific evaluation of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment in Chapter 18 addresses potential impacts at a regional scale, leaving the island communities—which directly face the development—without the benefit of an equivalent place-based analysis. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a position that fails to reflect the unique circumstances of the islands.

The reliance on regional averages obscures the realities of small island economies, which differ fundamentally from broader regional profiles. These economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors, such as natural and cultural assets. Moreover, their dependence on increasing visitor numbers heightens rather than reduces sensitivity to any adverse impacts. To characterise these communities as having low sensitivity without a targeted, place-based analysis is not supported by evidence but rests on unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's conclusions and the adequacy of proposed mitigation measures for island communities.

The proposal fails to comply with the relevant planning policies and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, the proposal does not meet the standards established by NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and given appropriate weight through meaningful engagement throughout the decision-making process, from inception to conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, the necessary assessments to understand the potential impacts on these communities have not been undertaken. As a result, there is no demonstrated compatibility between the proposal and the sustainability of island communities. Crucially, the statutory duties owed to these communities have not been fulfilled. In light of this, the proposal does not meet the required planning and statutory standards for assessing and protecting island communities, and permission should therefore be refused.

1.1.421 Ecology, Biodiversity and Habitats Regulations

While mitigation measures are proposed, they are unlikely to fully address the significant risks posed to Priority Marine Features and Annex I habitats present within the development area. The surrounding waters also support important populations of seabirds, marine mammals, and basking sharks, all of which would be exposed to disturbances from large-scale construction, operation, and decommissioning activities extending over several decades. Given the ecological sensitivity and the scale and duration of the proposed development, there is a

substantial potential for significant adverse environmental effects that mitigation alone cannot adequately prevent.

The practical consequence of the applicant's submission is that potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area have been acknowledged and addressed through specific derogation and compensation documents. These include a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, both directed at protecting the guillemot population within the designated site.

Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals the applicant's recognition that the proposed development may have significant environmental consequences requiring formal mitigation measures under derogation provisions. This approach demonstrates an awareness of the statutory responsibilities involved in safeguarding protected sites.

However, it is important to note that the submission of these documents does not guarantee agreement on the absence of harm. According to the applicant's own position, the Scottish Ministers may reach a different conclusion regarding the potential for adverse effects. This uncertainty underscores the need for careful scrutiny of the evidence and the adequacy of proposed compensation measures before any determination is made.

Consent for developments affecting protected habitats cannot be granted unless it is conclusively demonstrated that there will be no adverse effect on the integrity of the site. Under the Habitats Regulations, the competent authority must be satisfied beyond reasonable scientific doubt before approving any proposal. This high evidential standard places the burden of proof squarely on the applicant. Importantly, mitigation, compensation measures, and future monitoring plans alone do not suffice to meet the statutory tests. The rigorous legal framework includes the Habitats Regulations themselves, alongside GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these provisions establish a stringent policy context ensuring that protected habitats receive the highest level of safeguarding in decision-making.

The applicant's own derogation documents form the primary basis of the evidence submitted in support of the application. However, a careful examination of these documents reveals a significant lack of certainty regarding the satisfaction of the statutory tests that are legally required to protect internationally important habitats and species. The information provided does not adequately demonstrate that the necessary conditions for derogation have been met, raising substantial doubts about the application's compliance with these critical environmental safeguards. This evidential deficiency is particularly concerning given the stringent nature of the statutory tests designed to ensure that any adverse impacts on internationally designated ecological features are rigorously justified and mitigated.

Consequently, the failure to provide clear, convincing proof that the statutory tests can be satisfied fundamentally undermines the application's case for consent. Without meeting these legal requirements, the proposed development cannot be

considered compliant with the obligations to protect internationally important ecological assets. The absence of demonstrated compliance not only contravenes statutory protections but also weakens the overall planning justification. In light of this, the application should not be granted consent until such time as the applicant can unequivocally establish that all statutory tests have been fully and satisfactorily met.

1.1.422 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

The cumulative impact assessment fails to provide a reliable evaluation of the combined effects because it relies on flawed baseline assessments, resulting in an understated starting point. Specifically, the environmental impact assessment's underlying landscape, heritage, and socio-economic evaluations have already diminished the extent of identified effects. Consequently, the cumulative assessment inherits this reduced baseline, leading to an underestimation of the total impact when considering this proposal alongside other existing, consented, and foreseeable developments. This fundamental flaw undermines the credibility of the cumulative effects conclusions and calls into question the sufficiency of the mitigation measures proposed.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project's total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.423 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process's legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.424 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends immediately north-west of Islay and west of Colonsay—the application primarily considers Islay from the perspective of its potential use as a project location rather than as an impacted island community in its own right. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based evaluation of how this proximity would affect their local setting, economic activities, or community life. This absence undermines the reliability of the environmental and heritage impact assessment for these islands.

For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the proposed development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird populations here cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, has not been adequately considered, particularly regarding the impact on its open maritime setting. The deficiencies previously identified in the heritage assessment are fully applicable here, further calling into question the thoroughness and accuracy of the applicant's evaluation.

The applicant's own Coastal Character assessment acknowledges that the Sound of Iona is of high sensitivity, with a direct orientation towards the proposed development area and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in an overall effect deemed Moderate and Significant. The West Coast of Iona is similarly rated as highly sensitive with widespread visibility, and the applicant concedes significant effects for both residents and visitors across much of the island, including at Dùn Ì, the island's highest point. Furthermore, the applicant's baseline recognises Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—as heritage of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide a visualisation from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given its heritage context.

Community concerns further underscore the scale of the impact. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which has not been assessed. The perceived scale of the turbines can be contextualised by comparison with the landmark Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would surpass Ben Hynish by roughly 194 metres, despite being situated at about two-thirds of that distance. This comparison emphasizes the substantial visual intrusion and underlines that the applicant's assessment understates the significance of visual, community, and heritage impacts

on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment inadequately addresses the significant impacts on the coastal communities and landscapes of Mull and Ross of Mull, which has practical consequences for both local residents and the tourism economy. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only Medium magnitude of effect. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross. Furthermore, Fionnphort—the gateway to Iona and primary embarkation point for visitors—is identified as experiencing significant effects. This community is directly dependent on the flow of visitors, and yet no tailored, place-based assessment has been provided to reflect its unique relationship with the development.

Similarly, across Mull, significant effects are accepted by the applicant on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout at distances between approximately 21 to 33 kilometres. Despite this, the magnitude of effect is limited to Medium, which underplays the true visual and experiential impact on this nationally designated landscape. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small due solely to viewing distances exceeding 30 kilometres. Such an approach fails to adequately consider the cumulative and perceptual significance of the development in these sensitive locations.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers in its western townships—relies heavily on the intactness of the Atlantic seascape, which the proposed development would industrialise. Despite this dependency, none of these communities has been afforded a thorough, place-based assessment to understand the full extent of economic and social consequences. In sum, the applicant's evaluation does not satisfactorily capture the scale or significance of the effects on the landscapes and communities most intimately tied to these coastal and seascape environments.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, and attempts to evaluate the potential effects of the proposed development on their qualities. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the early stages of regeneration, with a small population whose recovery relies heavily on the integrity of its natural setting and unspoilt seascape. However, the applicant's assessment does not provide a specific evaluation of the effects on Ulva's landscape or community, despite the island sharing fully in the impacts on the designated area.

Regarding Staffa, although located approximately 35 kilometres from the development site—beyond the 30-kilometre radius recommended by NatureScot for

assessment of National Scenic Area qualities—the applicant acknowledges the panoramic maritime qualities of the island but concludes that the scale of change would be small and the effect not significant. This conclusion appears to downplay the importance of Staffa's celebrated status as one of Europe's most renowned small islands.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

In summary, while the applicant's assessment acknowledges the presence of these important designated landscapes and their varying sensitivities, it appears to underestimate or omit detailed consideration of significant effects, particularly with regard to Ulva's vulnerable island community and the cultural and natural qualities of the more distant but highly valued islands such as Staffa and Jura. This raises concerns that the full extent of potential impacts on these landscapes and communities has not been adequately addressed, thereby undermining the protection of their distinctive natural and cultural characteristics.

The applicant's assessment characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

The applicant’s assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape within the development’s vicinity. For example, Gigha, a community-owned island whose acquisition by its residents has become emblematic of island regeneration, faces the development waters from the east. The potential impacts on Gigha’s finely balanced community and economy have not been examined, leaving a gap in the assessment’s comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptors affected by the distance-based moderation approach critiqued in this objection. The failure to assess effects on this important coastal vantage point undermines the robustness of the applicant’s evaluation.

Moreover, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts with views toward the development area, share a similar exposure. The absence of any assessment of impacts on these interconnected communities and seascapes further compromises the completeness of the applicant’s environmental considerations.

The applicant’s environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.425 Personal Observations

In addition to the planning matters above, I am personally concerned because: I believe that industrialization of the Hebrides will be catastrophic for local nature, wild areas and I believe there are more positive alternatives that can be more respectful to people and wildlife.

Based on my own local knowledge, I also wish to highlight that: Marine mammals, birds, bats and fish

Finally, I would also ask the Scottish Ministers to consider: Standing up for local economies, the wilderness of the hebrides and how precious it is.

1.1.426 Further Comments

I stand by the local communities who deserve to make decisions about clean energy and protecting the biodiversity and precious wildlife that has already taken a hit from so much of industrialization.

1.1.427 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. Moreover, independent scrutiny of the submitted documentation reveals that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the island communities were identified, they have never undergone a comprehensive appraisal. Additionally, the ecological criteria required to support the proposal have not been satisfactorily demonstrated as achievable. It is also notable that only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers contemplate approval, it is requested that they first mandate the submission of further environmental information and enhanced visual representations. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing for thorough examination of the concerns raised in this objection. Irrespective of the ultimate decision, it is also requested that Ministers explicitly address and conclude on the proposal's effects on cultural heritage and the island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 143
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. I request that my objection be officially recorded and that I receive notification of the final determination concerning these applications.

The proposals envisage an offshore wind energy development with a capacity of approximately 2 gigawatts, incorporating between 91 and 144 turbines, each reaching up to 335 metres to blade tip. This facility is to be located within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine environment situated northwest of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections detail the planning and environmental grounds upon which I base my objection, framed by the statutory and policy context relevant to the determination of these applications. It is important to emphasise that the onus lies with the applicant to provide compelling evidence demonstrating compliance with all applicable tests and requirements. There is no requirement for objectors to substantiate the contrary position. In this instance, the applicant has failed to meet this evidentiary burden, and accordingly, the applications should be refused.

1.1.428 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal's failure to meet the impact criteria set out in NPF4 Policy 11 is that it cannot receive the policy's intended support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon compliance with specific impact tests designed to protect communities, landscapes, seascapes, and other sensitive receptors. The proposal, however, does not satisfy these conditions, thereby undermining its eligibility for policy backing.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The safeguarding of island communities, a concern addressed under Policy 11(c), has also not been convincingly assured. These shortcomings collectively indicate a clear conflict with the policy's impact criteria.

Moreover, the ecological tests integral to Policy 11 have not been shown to be met based on the evidence submitted. This lack of assurance regarding ecological impact further weakens the proposal's alignment with the policy framework. In summary, the proposal's failure to satisfy these critical impact requirements means it cannot legitimately benefit from the support that NPF4 Policy 11 offers for renewable energy projects.

In considering the proposal against the suite of relevant NPF4 policies designed to protect designated assets, it is notable that mitigation measures have not sufficiently addressed the range of potential adverse effects. Policy 11, together with Policies 4(c) and 4(d), establishes clear protections for National Scenic Areas and nationally important landscapes, aiming to prevent significant harm to the qualities for which these areas are recognised. The evidence demonstrates that the proposal would result in significant adverse effects on these designated landscapes and seascapes, indicating that the mitigation measures proposed are inadequate to uphold the standards set by these policies.

Furthermore, the proposal must be assessed in relation to the safeguarding of cultural heritage. Policy 7, including its subsections 7(h), 7(c), and 7(d), requires that scheduled monuments and their settings are protected, recognising their cultural significance. The evidence before the decision-maker does not satisfactorily demonstrate that the proposal would avoid harm to these heritage assets or their settings. This lack of demonstrated protection represents a clear conflict with the policy framework intended to preserve nationally important historic assets.

Lastly, the ecological implications of the proposal must be considered under Policy 3 on biodiversity. The assessment concludes that the ecological tests set out within this policy have not been convincingly met based on the evidence submitted. Additionally, the proposal fails to show that the interests of island communities would be safeguarded, further underscoring its shortcomings in meeting the comprehensive requirements of NPF4. Taken together, these points indicate that the proposal does not comply with the full range of policies designed to protect designated landscapes, heritage assets, and biodiversity.

The applicant’s evidence acknowledges that, in relation to terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2, the proposal would have significant adverse effects. Specifically, it would detrimentally impact the landscape, heritage assets, and community interests that these policies are designed to safeguard. This demonstrates a clear inconsistency with the relevant development plan framework. Furthermore, when considered alongside National Planning Framework 4 in its entirety, the proposal remains contrary to established planning objectives. The applicant has not provided sufficient justification to overcome these conflicts, and as such, the proposal cannot be regarded as compliant with the terrestrial development plan framework governing land-based effects.

1.1.429 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant’s assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant’s written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is

attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

When comparing the proposed mitigation measures, it is important to recognise that the visualisation materials submitted in support of the assessment possess inherent limitations that affect their reliability as a tool for fully understanding visual impacts. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This fundamental shortcoming means that any mitigation strategies evaluated primarily through such visualisations may not reflect the actual visual experience on site.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. They serve as a technical rendering within the overall visualisation package rather than functioning as an independent means to correct or enhance visual accuracy. Consequently, reliance on these materials without acknowledging their technical and perceptual limitations risks underestimating or misrepresenting the visual effects of the development. This calls for caution in drawing firm conclusions from the visual evidence as currently presented.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational lifespan. This lighting would be a novel and continuous presence, fundamentally changing the visual environment after dark in an area that is at present characterised by natural darkness and minimal artificial illumination. The significance of this change is heightened by the permanence of the effect during the development's operational period, which underscores the extent to which the night-time seascape character would be impacted.

From a policy perspective, it is important to note that the 35-year operational life does not mitigate the harm caused to the seascape. The decision to grant consent for this development is effectively a determination that the seascape in question is appropriate for wind farm use, notwithstanding the permanent visual changes introduced by lighting. This recognition emphasises that the harm to night-time character is not merely a temporary inconvenience but a lasting transformation accepted under planning policy. Consequently, the implications of lighting effects on the seascape must be carefully weighed within the overall planning balance, with full awareness that the decision establishes a precedent for the suitability of this environment for such development and its associated visual impacts.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.430 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment follows Historic Environment Scotland’s established methodology for evaluating the effects of development on the setting of historic assets. This recognised approach, developed and refined in consultation with Historic Environment Scotland, mandates a specific evaluation of whether changes to setting affect the contribution that setting makes to an asset’s cultural significance and whether the integrity of that setting is sufficiently preserved. Importantly, the methodology clarifies that visual change alone should not be automatically equated with an adverse impact, thereby requiring a nuanced assessment beyond mere visibility or prominence.

However, a Methodological Audit conducted in support of community objections, relying exclusively on the applicant’s Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the applicant’s report acknowledges key heritage attributes and describes visual changes in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not demonstrate how the integrity of setting has been evaluated in accordance with the prescribed methodology. The essential evaluative step—judging whether the integrity of setting is adequately retained—is absent from the examples examined by the Audit. Consequently, the reliability of the applicant’s conclusions regarding heritage impacts is undermined, as the required methodological rigor has not been fully applied.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The practical consequence of relying on a landscape assessment that understates effects is that the heritage impact conclusions drawn from it become inherently unreliable. Where the landscape assessment fails to fully acknowledge the extent or significance of impacts, any subsequent heritage analysis that depends on that assessment will similarly minimize or overlook important consequences. This calls into question the overall robustness of the heritage conclusions presented.

Specifically, as noted in the evidence, the heritage conclusions are explicitly dependent upon the landscape assessment. Therefore, any understatement or omission within the landscape evaluation is inevitably carried forward, resulting in a cumulative understatement of effects on heritage assets. This interdependency means that deficiencies in the landscape assessment do not remain isolated but rather undermine the integrity of the entire heritage impact appraisal.

Given this dependency and the identified understatement of landscape effects, it is essential that the landscape assessment be revisited and revised to accurately reflect all significant impacts. Only then can the heritage conclusions be considered credible and reliable for planning purposes. Without such a reassessment, the current heritage impact conclusions lack the necessary evidential foundation and should not be accepted as robust.

The application engages directly with several key statutory policies, notably National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the settings of heritage assets. Additionally, it must be considered in the context of GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively set out the framework for safeguarding cultural heritage within marine and terrestrial planning domains. These provisions underscore the imperative to rigorously assess and ensure the protection of internationally and nationally important heritage assets and their settings, reflecting a high level of statutory protection and policy priority.

However, the applicant has not furnished evidence demonstrating that the cultural significance of these heritage assets and their settings will be adequately protected. Critically, the Scottish Ministers have not been presented with the requisite

assessment that such a conclusion would necessitate. In the absence of a robust and comprehensive evaluation of potential impacts on the cultural heritage, the application fails to satisfy the stringent policy requirements referenced. This deficiency undermines the acceptability of the proposal, as it does not provide the necessary assurance that heritage assets of recognised national and international importance will be preserved in accordance with the statutory and policy framework.

1.1.431 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness, as identified in the applicant's own baseline assessments. Any alteration to these defining qualities would directly undermine the economic foundations of these communities. This, in turn, would jeopardise essential local services, diminish population stability, and threaten the long-term viability of the island settlements.

The applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities; however, no assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, examining potential port communities in detail, yet it fails to conduct any equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not adequately represented by regional averages, as their economic activity is concentrated in sectors most vulnerable to changes in the very qualities that attract visitors. Furthermore, an increased reliance on visitor numbers does not diminish this sensitivity; rather, it intensifies dependence on those qualities at risk. Therefore, the conclusion of low sensitivity, reached without any place-specific analysis, cannot be regarded as evidence but instead represents an unfounded assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or mitigate the potential impacts on island communities.

The proposal fails to meet essential planning and statutory standards concerning the protection and assessment of island communities, resulting in a significant shortfall in compliance that undermines the decision-making process. National Marine Plan policy GEN 19 and paragraph 4.81 explicitly require that decisions affecting marine and island environments be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is incomplete or uncertain. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and appropriately weigh the interests of island communities, ensuring meaningful engagement from the earliest stages through to the conclusion of the planning process.

In this case, the applicant has acknowledged the necessity of particular scrutiny for island communities but has failed to conduct the requisite assessment to understand the proposal's potential effects on them. There is a notable absence of evidence

demonstrating compatibility with the sustainability of these communities, nor is there any indication that the statutory duties owed to island populations have been satisfactorily fulfilled. This omission contravenes both policy and legislative requirements, leaving the interests of island communities insufficiently considered and inadequately protected.

In conclusion, the proposal does not comply with the relevant planning policies or statutory obligations relating to island communities. The lack of a thorough assessment and meaningful engagement means that the proposal cannot be regarded as compatible with the principles of sustainable development for island communities, nor can it be approved without rectifying these fundamental deficiencies.

1.1.432 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring construction, operational, and decommissioning activities into an ecologically sensitive marine environment on a very large scale and for an extended period of several decades. This sustained presence of industrial activity is likely to have significant adverse effects on the local ecosystem due to the scale and duration of disturbance.

The site itself contains Priority Marine Features and Annex I habitats, which are recognised for their ecological importance and vulnerability. Surrounding waters are also home to a range of protected species, including seabirds, marine mammals, and basking sharks. The presence of such habitats and species underscores the high environmental sensitivity of the area and the potential for the proposed development to cause substantial ecological disruption.

Given these factors, careful consideration must be given to the potential environmental impacts before proceeding. The scale of activity and the ecological value of the site and adjacent waters together indicate a significant risk of harm to protected habitats and species, which must be fully accounted for in the planning process.

The applicant’s submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan constitutes a critical element in the assessment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area. These documents acknowledge the possibility that the proposed development may affect the integrity of this protected site, specifically targeting the guillemot population, and are indicative of the applicant’s recognition that such impacts cannot be definitively excluded at this stage. By preparing these documents, the applicant is addressing the requirements set out under derogation provisions, which are invoked when adverse effects on a protected site are uncertain but cannot be ruled out. It is important to note that, as per the applicant’s own position, the Scottish Ministers retain the discretion to reach a different conclusion regarding the presence or absence of adverse effects on site integrity. Therefore, the submission of these derogation and compensation documents is both a procedural necessity and a substantive acknowledgment of potential environmental risks associated with the proposal. This measure should be seen as an integral part of the

application, reflecting a responsible approach to managing possible impacts on protected ecological interests.

While mitigation, compensation proposals, and future monitoring are often advanced as means to address potential impacts on protected habitats and species, such measures alone do not satisfy the stringent legal requirements under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before granting consent. This high evidential standard places the burden squarely on the applicant to demonstrate compliance; mitigation strategies, without unequivocal proof, cannot substitute for the necessary certainty demanded by law.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, they ensure that developments affecting protected habitats are rigorously assessed to prevent adverse effects. Any consent granted must therefore reflect full adherence to these statutory and policy requirements, ensuring that the integrity of designated sites is maintained without compromise.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed, as it does not adequately safeguard internationally important ecological features. A detailed review of the submitted evidence, including the applicant's own derogation documents, reveals a lack of sufficient certainty that the legal protections for habitats and species of international significance will be upheld. This shortfall undermines the applicant's case for granting consent, as the statutory requirements designed to prevent adverse impacts on these protected features remain unmet. Consequently, the application fails to satisfy the necessary legal standards, and consent should be withheld accordingly.

1.1.433 Cumulative and In-Combination Effects

The current application assesses only a portion of the overall development, omitting critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. Consequently, these significant elements are deferred to separate future applications and are not evaluated alongside the principal proposal. This fragmented approach contravenes established legal principles, as confirmed by the courts in Raeshaw Farms, which mandate that a project must be considered in its entirety rather than segmented into smaller parts to minimise perceived impacts. By failing to assess the full scope of the project collectively, the decision-making process is compromised, undermining the comprehensive evaluation of environmental and planning effects required for a lawful and robust determination.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically,

where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

There remains considerable uncertainty regarding compliance with established planning policies and environmental regulations, particularly concerning the issue of project splitting. The applicant has not sufficiently demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), or the Environmental Impact Assessment Regulations. Specifically, the cumulative and in-combination effects of the proposal, as well as the overall impacts of the project, have not been reliably identified or thoroughly assessed.

This omission is significant as it undermines the integrity of the decision-making process. It is therefore essential that the treatment of any deferred works be explicitly addressed in the determination. Without such clarification, the potential environmental consequences may remain inadequately evaluated, which is contrary to the requirements of the relevant policy framework and statutory duties. Consequently, I respectfully request that these matters be given explicit and comprehensive consideration before any approval is granted.

1.1.434 Public Engagement, Site Selection and Environmental Information

The practical consequence of the inadequacies in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are currently unable to make a fully informed decision on the application. The environmental information provided does not meet the requirements of the EIA Regulations, which mandate that likely significant effects must be comprehensively understood before determination. This shortcoming directly affects the integrity and reliability of the decision-making process.

The application identifies potential pathways to significant environmental effects but fails to investigate them thoroughly. For example, the landscape assessment produces outcomes based on distance patterns not supported by its own stated methodology, while the heritage assessment does not demonstrate the application of its own integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis of the affected islands, leaving critical contextual information absent. These methodological deficiencies undermine the sufficiency of the environmental evidence.

Additionally, the reliance on future assessments, post-consent plans, monitoring, and further approvals cannot substitute for a complete and robust EIA at this stage. The Scottish Ministers must base their determination on the evidence presently before them, not on assumptions that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this essential purpose, and therefore, the application should not be approved in its current form.

1.1.435 Effects on Local Area

The applicant's mitigation measures fall short in adequately addressing the direct and significant effects on the communities of Islay, Colonsay, and Oronsay. While the development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, the assessment treats Islay primarily as a potential project location rather than as a distinct island community with its own social and economic characteristics. This approach neglects a place-based evaluation of the impacts on Islay's Atlantic-facing communities, which are situated closest to the development boundary and whose daily lives and local economy are inextricably linked to their coastal setting. Consequently, the application's failure to assess how the development might alter the community's sense of place or economic wellbeing undermines the reliability of its environmental evaluation.

Similarly, for Colonsay and Oronsay, the environmental and heritage assessments inadequately consider the significance of the seaward outlook that defines daily life. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is at the centre of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is affected by gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these deficiencies demonstrate that the application underestimates the scale and nature of impacts on the local communities, economy, and heritage, calling into question the robustness of the overall environmental and heritage impact evaluation.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development. It identifies extensive visibility across a large geographical extent, approximately 21 kilometres, with turbines spanning about 39 degrees of the horizon. The assessment recognises moderate and significant overall effects, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is described as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors throughout much of the island, including at its highest point, Dùn Ì. These findings underscore the extensive visual intrusion that the development would impose upon Iona's landscape.

Beyond visual impacts, the applicant's baseline acknowledges the international importance of Iona's monastic heritage, including the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, such as from the ferry crossing itself; however, the applicant failed to provide visualisations from critical vantage points like the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant did not assess habitability, despite its identification as a potential pathway of effect on the community. The perceived scale of the turbines can also be demonstrated by comparison with the familiar landmark of Ben Hynish on Tiree—141 metres high and

visible from Iona at 33 kilometres—while the largest turbines would overtop Ben Hynish by approximately 194 metres at a closer distance of roughly two-thirds of that span. Taken together, these factors indicate that the applicant's assessment substantially underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes underestimates the significant visual and economic impacts, particularly when compared to the mitigation measures proposed. While the applicant acknowledges significant effects at Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital community dependent on visitor flow—these acknowledgements appear insufficiently weighted in relation to the wider implications for the area. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres, yet the attributed magnitude is only Medium. Similarly, across Mull itself, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area, with the Loch na Keal National Scenic Area, noted for its High sensitivity between 21 and 33 kilometres, receiving no greater than a Medium magnitude rating. This comparative underestimation of effect magnitude suggests that the applicant's proposed mitigation may not adequately address the scale of impact on the communities and landscapes that are integral to the local tourism economy.

Moreover, the applicant's reliance on distance-based reasoning to minimise the perceived scale of change further undermines the robustness of the assessment. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment discounts significant impact on the basis that the viewing distance exceeds 30 kilometres, judging the scale of change to be small. This approach fails to fully consider the cumulative and experiential nature of visual impact on a tourism-dependent region. Mull's west-facing tourism economy, which encompasses wildlife boat operations and the accommodation services of its western townships, fundamentally depends on the unspoiled Atlantic seascape that the proposed development would industrialise. Notably, none of these communities has received a place-based assessment that would capture the nuanced effects on their economic sustainability and community well-being. In light of these factors, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull, warranting a more thorough and locally sensitive evaluation.

The applicant's assessment acknowledges potential effects on several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, situated within the Loch na Keal National Scenic Area, is identified as experiencing the full range of effects noted for that landscape. Importantly, Ulva is a community-owned island undergoing a process of regeneration, with a small re-establishing population whose future depends heavily on the preservation of the island's setting and unspoilt seascape qualities. Despite this, no specific assessment has been made regarding the impact on Ulva's community and its recovery, which raises concerns about the adequacy of the applicant's evaluation.

Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the roughly 30 kilometres that NatureScot requested for assessment of effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, even though their own assessment recognises the island's panoramic maritime qualities. This conclusion suggests a potential underestimation of the significance of impacts on such a valued and sensitive landscape.

The Jura National Scenic Area, located between approximately 28 to 32 kilometres from the development, is assessed by the applicant as having high sensitivity but is attributed no greater than medium to low magnitude of impact. This moderation is justified by factors such as distance, the apparent scale of development, and the retention of landforms, despite the designation's reliance on the wild and undeveloped character of Jura's Atlantic outlook. A similar approach is taken for the Scarba, Lunga and the Garvellachs National Scenic Area at around 35 to 40 kilometres, where effects are also considered limited. Taken together, these assessments indicate a tendency to downplay the potential effects on the distinctive qualities of these important seaboard landscapes and the vulnerable island communities they support, thereby undermining the protection of their natural and cultural values.

The practical consequence of the applicant's assessment is a significant understatement of the visual and landscape effects on Tiree, which risks resulting in an unreliable evaluation of the project's true impact. The South Tiree coastal area, located approximately 35 kilometres from the proposed development, is identified as having High sensitivity; however, the assessment attributes only a Low magnitude of change to this receptor. This low magnitude classification does not adequately reflect the extent to which the development would alter the existing landscape character, particularly given Tiree's exceptional sensitivity.

Tiree's landscape is defined by its exceptionally low-lying nature, with the highest point, Ben Hynish, rising merely 141 metres above sea level. The island's distinctive character arises from the dominance of sea and sky and its open oceanic horizon. Introducing turbines up to 335 metres in height would place vertical structures into the seascape that have no precedent on the island. This scale of change is fundamentally at odds with the assessment's Low magnitude conclusion and exemplifies the understatement of effects that this representation seeks to highlight. Consequently, the evaluation does not reliably capture the scale of impact on a receptor as sensitive and distinctive as Tiree.

While the applicant's assessment applies distance-based mitigation measures to certain seascape receptors, this approach fails to address significant effects experienced by mainland and island communities with direct views and economic dependence on the seascape. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors

subject to the contested distance-based mitigation, have not been adequately assessed. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts sharing outlooks towards the development area are likewise excluded from comprehensive evaluation. This omission compromises the thoroughness of the applicant's environmental appraisal and undermines the reliability of conclusions regarding the seascape's wider social and economic sensitivities.

There remains considerable uncertainty surrounding the applicant's reliance on a distance-based methodology that applies systematic moderation and discounting of effects beyond approximately 20 kilometres. This approach inherently assumes that impacts diminish uniformly with distance, yet it fails to account for the nuanced and place-specific sensitivities of receptors located beyond this threshold. Such generalisation risks overlooking significant adverse effects that may persist or manifest differently at greater distances, thereby compromising the thoroughness of the environmental impact assessment.

Critically, as evidenced, the applicant's assessment effectively minimises the magnitude of change experienced by highly sensitive receptors beyond the 20-kilometre boundary, while neglecting to conduct any detailed place-based evaluation for the affected communities. This procedural omission undermines the integrity of the assessment process and its conclusions, leaving those communities without due consideration of the effects they endure. Consequently, the applicant's approach does not provide a robust or comprehensive appraisal of environmental impacts and should be re-examined to ensure all significant effects are properly identified and addressed.

1.1.436 Personal Observations

In addition to the planning matters above, I am personally concerned because: This affects Scotland as a whole. It not only is a dreadful proposal as listed in the topics of objection but sets a precedent which in time will be to the detriment of Scotland as a whole. The UK in fact.

Finally, I would also ask the Scottish Ministers to consider: Wake up, you should be acting as guardians of our beautiful country, not advocating for its decimation. We can live good lives without unnecessary violations.

1.1.437 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been

undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 144
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386. These applications seek consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be officially recorded and that I be kept informed of the outcome of the decision-making process.

The proposed development involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would consist of between 91 and 144 wind turbines, each reaching up to 335 metres in height to blade tip. The site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment located north-west of Islay and west of Colonsay, positioned roughly 21 kilometres from Iona. The proximity of the proposal to these islands and the broader southern Hebrides coastal communities is a significant factor in the assessment.

In presenting my objection, I outline the planning and environmental grounds grounded in the statutory and policy frameworks relevant to these applications. It is imperative to note that the onus lies entirely with the applicant to satisfy all applicable tests and demonstrate compliance with the necessary criteria through adequate evidence. Objectors bear no obligation to prove any contrary position. Having considered the evidence and arguments put forward, it is clear that the applicant has not fulfilled this responsibility. Consequently, I contend that consent for the MachairWind Offshore Wind Farm should be refused.

1.1.438 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties under Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The applicant has not adequately addressed these requirements nor shown that reasonable steps have been taken to mitigate adverse effects on these interests. Furthermore, the Scottish Ministers, in determining this application, must have regard to these same duties. The absence of demonstrated compliance, alongside identified deficiencies and omissions in the evidence, constitutes a direct conflict with the applicable legal and policy framework and weighs decisively against the granting of consent.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby precluding lawful authorisation. Under Part 4 of the Marine (Scotland) Act 2010, decisions on marine licences must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application does not meet this threshold.

Specifically, the application does not adequately address compliance with key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies are integral to the statutory assessment process.

The evidence identifies clear deficiencies and omissions in the application's supporting information and assessment against these policies. There is no demonstration that the proposal can coexist appropriately with other marine users as required by GEN 4. The historic environment considerations under GEN 6 are inadequately addressed, failing to meet the standards set out in paragraphs 4.22 to 4.23. Landscape and National Scenic Area impacts under GEN 7 remain unassessed in accordance with paragraph 4.28. Natural heritage impacts under GEN 9 are not sufficiently evidenced. The engagement process required by GEN 18 is not satisfactorily documented. The application lacks sound evidence as mandated by GEN 19 and paragraph 4.81, and it fails to properly consider cumulative impacts as required by GEN 21 and paragraph 4.85.

Where compliance with these statutory policies has not been demonstrated, and where the evidence reveals deficiencies and conflicts with the legal and policy framework, these matters must weigh decisively against the granting of consent. The application's failure to meet these fundamental requirements renders it unacceptable and justifies refusal of the marine licence.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are directly engaged by this proposal. However, the evidence before the determining authority does not demonstrate compliance with these key policies.

NPF4 must be applied alongside relevant statutory duties and legislative requirements, and where compliance is not shown, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent. In this case, the applicant has failed to provide sufficient evidence to confirm that the proposal meets the biodiversity objectives of Policy 3, nor has it adequately addressed the protection and enhancement of natural places as required by Policy 4. Similarly, the impact on historic assets and places has not been satisfactorily assessed or mitigated in accordance with Policy 7. Furthermore, the proposal does not demonstrate conformity with Policy 11 concerning energy considerations.

Given these unresolved deficiencies and the absence of demonstrated compliance with the statutory and policy requirements of NPF4, the proposal conflicts with the applicable legal and policy framework. Consequently, these matters must be afforded significant weight against the granting of planning permission.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland)

Regulations 2017 and the corresponding marine works regulations, which mandate that any proposal's likely significant environmental effects be thoroughly identified, assessed, and reported prior to determination. The evidence before the determining authority does not demonstrate that these requirements have been met. There is a clear absence of a comprehensive Environmental Impact Assessment (EIA) that adequately addresses the full range of potential environmental consequences arising from the proposal. This failure to provide a complete and robust EIA undermines the statutory process and leaves the decision-making body without the necessary information to properly evaluate the environmental implications, contrary to the explicit legal framework governing such developments.

Furthermore, the applicant has not complied with the Habitats Regulations, which require an assessment of the proposal's effects on European protected sites in accordance with the applicable statutory tests. The evidence reveals that the necessary Habitats Regulations Assessment (HRA) has either not been undertaken or is insufficient to demonstrate that the proposal will not adversely affect the integrity of protected habitats. This omission constitutes a fundamental breach of the statutory duties imposed by the Habitats Regulations. Where compliance with these legal requirements has not been demonstrated, and where deficiencies and omissions are evident, the law is clear that such failures must weigh decisively against the granting of consent. In the absence of satisfactory environmental and habitats assessments, the proposal cannot lawfully proceed.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unequivocal, as set out in the Act and reiterated in the applicant's own evidence (S01). The absence of any substantive evidence showing that these interests have been properly identified, assessed, or integrated into the planning considerations constitutes a fundamental procedural and legal deficiency.

Moreover, the applicant's documentation does not address or rectify this failure, resulting in a significant omission that conflicts with the applicable legal and policy framework. The Islands (Scotland) Act 2018 is explicit in its requirement that where compliance cannot be demonstrated, or where deficiencies and omissions are evident, these matters must weigh against the granting of consent (S01). In this case, the lack of any meaningful engagement with or assessment of island community interests means that the proposal cannot be considered compliant with the statutory duty imposed by the Act.

Given this clear statutory requirement and the applicant's failure to meet it, the proposal should be refused on the grounds that it does not properly consider or give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018. This failure undermines the integrity of the decision-making process and is a decisive material consideration against the granting of planning permission.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements, thereby undermining the

basis for the granting of planning consent. It is a well-established principle that the onus lies squarely with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. In this case, the evidence submitted does not meet this evidential burden.

Specifically, the applicant's submissions lack the necessary comprehensive and conclusive demonstration of adherence to the full spectrum of statutory and policy obligations. Where such compliance has not been unequivocally established, or where the evidence reveals deficiencies, omissions, or conflicts with the relevant legal and policy framework, these shortcomings must be given significant weight against the proposal. The absence of clear and convincing evidence confirming compliance means that the application cannot be considered to have fulfilled the mandatory requirements imposed by law and policy.

Consequently, the failure of the applicant to provide adequate evidence of compliance constitutes a substantive procedural and substantive defect. This deficiency alone justifies the refusal of planning permission, as the statutory and policy frameworks demand certainty and transparency which have not been demonstrated. In summary, the application should be refused on the grounds that the applicant has not met the essential evidential burden to prove compliance with all relevant legal and policy requirements.

1.1.439 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 is designed to support renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, including those relating to effects on communities and landscapes as set out in Policy 11(c), (d), and (e). The proposal in question fails to meet these critical tests. Unlike developments that successfully mitigate harm to designated landscapes or communities, this proposal does not demonstrate adequate measures to address the significant adverse effects it would impose on nationally designated landscapes and seascapes. The absence of effective mitigation undermines any claim that the development aligns with the policy's requirements, as the adverse impacts remain substantial and unresolved.

Moreover, the proposal does not sufficiently safeguard the cultural significance of scheduled monuments or their settings, nor does it provide convincing evidence that island communities would be protected from detrimental effects. The ecological assessments submitted also fall short of demonstrating that the necessary environmental safeguards can be achieved. Taken together, these deficiencies mean that the proposal conflicts fundamentally with the impact criteria embedded within NPF4 Policy 11. Consequently, the proposal cannot be supported on the basis that it fails to satisfy the policy's essential conditions for renewable energy developments.

The practical consequence of the proposal is that it would result in significant adverse effects on multiple nationally important designated assets, undermining key protections established by the National Planning Framework 4 (NPF4). Specifically, the proposal fails to comply with Policy 11 and related provisions such as Policy 4(c)

and 4(d), which safeguard National Scenic Areas and other nationally important landscapes by preventing significant harm to the qualities that justify their designation. Moreover, it conflicts with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets. The evidence clearly indicates that these cultural heritage considerations have not been adequately addressed to demonstrate protection or appropriate mitigation.

In addition, the proposal does not meet the requirements of Policy 3 relating to biodiversity. The submitted evidence falls short of demonstrating that the ecological tests, which are fundamental for safeguarding biodiversity, can be satisfied. It also fails to show that island communities, which may be particularly vulnerable, would be adequately safeguarded in accordance with the framework. Taken together, these shortcomings indicate that the proposal conflicts with multiple NPF4 policies designed to protect nationally designated landscapes, heritage assets, and biodiversity, and therefore cannot be supported without significant revision and further evidence.

The applicant's evidence acknowledges that the proposal would adversely affect the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2, as well as other relevant terrestrial development policies. This demonstrates a clear conflict with the development plan framework insofar as it relates to land-based effects. Furthermore, the proposal is inconsistent with the National Planning Framework 4 when considered in its entirety, and the applicant has not provided sufficient justification to overcome this fundamental conflict. Consequently, the proposal fails to accord with the established terrestrial planning policies that protect the local environment and community interests.

1.1.440 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the reliability of the applicant's assessment methodology, particularly in relation to distance thresholds and their influence on the predicted effects. The methodology set out in Appendix 16.1 does not specify any distance beyond which major effects would cease to occur. However, an independently prepared Evidence Note, which draws solely on the applicant's Chapter 16 and related appendices, identifies a clear pattern across all three assessment streams. This pattern reveals that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

Further examination of the applicant's own documents demonstrates the importance attached to distance in forming judgements. For example, in the assessment of a coastal area situated over 30 kilometres away, the scale of change is described as small explicitly due to the viewing distance involved. Moreover, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This gradation inherently moderates the perceived magnitude of change as distance increases.

The consequence of this approach is that the protective tests required by the planning process are being applied to inputs that systematically understate potential impacts. By moderating magnitude at the very distances where the most sensitive designated landscapes are located, the assessment conclusions fail to provide a reliable account of the effects that the Scottish Ministers are being asked to consent to. This casts doubt on the adequacy of the appraisal and calls for a more robust and transparent evaluation framework before any determination is made.

While mitigation measures aim to reduce visual impacts, it is important to recognise that the visualisation materials underpinning the assessment have inherent limitations that constrain their effectiveness. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully convey the scale perceived by a viewer in situ. Furthermore, the wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings dependent on the photographic base rather than serving as independent corrections. Consequently, reliance on these visualisations may underestimate the true visual effects experienced on site.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently devoid of any artificial illumination, thereby permanently altering the character of the night-time seascape throughout its stated 35-year operational lifespan. This change represents a significant departure from the existing conditions, where the absence of lighting contributes to the natural and unspoiled visual quality of the marine environment after dark.

Furthermore, this operational timeframe does not mitigate the policy implications of the harm caused. Granting consent for this development effectively constitutes an acknowledgment that the seascape in question is appropriate for wind farm use, with all the attendant visual impacts that such use entails. Therefore, the decision carries substantial weight in shaping the future character and management of the night-time seascape, beyond the immediate term of the development's operation.

The proposal's acknowledged effects on landscape and seascape interests are significant and directly engage multiple key policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively provide a robust framework intended to safeguard nationally important natural and coastal environments from adverse impacts.

However, the applicant has failed to demonstrate that its assessment of the scale of these effects aligns with the methodology it sets out. This lack of internal consistency undermines confidence in the conclusions presented, raising serious doubts about the reliability of the impact evaluation. Without a clear and methodologically sound justification, it is not possible to ascertain whether the proposal adequately protects the sensitive landscape and seascape features recognised in the relevant planning policies.

In light of these shortcomings, it is evident that the proposal does not comply with the essential provisions designed to protect nationally important landscapes and seascapes. Consequently, the development should not be supported as it stands,

given its failure to meet the requirements of policies intended to ensure the preservation and enhancement of these vital environmental assets.

1.1.441 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework that necessitates a careful evaluation of how changes to setting influence the contribution that setting makes to an asset's cultural significance. This methodology, developed through consultation with Historic Environment Scotland, explicitly distinguishes between mere visual change and adverse impact, emphasising that visual alterations alone should not be equated directly with harm. Crucially, it requires an assessment of whether the integrity of the setting is adequately retained, ensuring that any conclusions drawn about heritage impacts rest on a rigorous evaluative process rather than descriptive observations.

However, a Methodological Audit prepared to support community objections, utilising only the applicant's Appendix 14.3, finds that although the operational assessment identifies relevant heritage attributes, it fails to demonstrate that the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment's narrative focuses predominantly on visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation before concluding that the integrity of setting remains intact. This represents a critical omission, as the required evaluative step—linking these observations explicitly to the retention or loss of setting integrity—is absent in all the worked examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is fundamentally undermined.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, the relationships between monuments, spirituality, and the encompassing landscape and seascape, which are experienced dynamically rather than from fixed viewpoints. However, Historic Environment Scotland's consultation responses, as recorded within the application, highlight the need for additional viewpoints to adequately capture and represent these broader experiential and cultural landscape qualities. This indicates that the current assessment may not fully encompass the intangible and movement-based aspects integral to the heritage assets' significance, thereby necessitating a more comprehensive approach to ensure that the full cultural context is properly considered in the impact evaluation.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact

assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.442 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social sustainability. These visitors are drawn specifically by the qualities identified in the applicant's own baseline studies: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Any alteration to these fundamental attributes would directly undermine the economic foundation upon which these communities depend.

Such a detrimental impact would extend beyond the immediate loss of visitor appeal. The economic consequences would inevitably affect local services, diminish the resident population, and threaten the ongoing viability of the island communities as a whole. Therefore, the proposal poses a serious risk to the essential qualities that sustain these communities and should be carefully reconsidered in light of this critical dependence.

The practical consequence of the applicant's approach is a failure to accurately identify or mitigate significant socio-economic impacts on the island communities affected by the proposal. Although the applicant's own consultants acknowledged habitability as a potentially significant pathway of effect, no subsequent assessment of the habitability of those islands was undertaken. Instead, the socio-economic evaluation presented in Chapter 18 focuses primarily on regional-level analysis, detailing impacts on port communities but neglecting any equivalent place-based assessment of the island populations directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a conclusion that lacks a firm evidential basis.

This conclusion disregards the distinct economic characteristics of small island economies, which are not comparable to regional averages. Such economies are typically concentrated in sectors most vulnerable to changes in the environmental and experiential qualities that attract visitors. Rather than reducing sensitivity,

increased dependence on rising visitor numbers intensifies economic vulnerability to any adverse changes. Therefore, the claim of low sensitivity without specific, place-based analysis amounts to an unsubstantiated assumption rather than a reasoned finding. This undermines the reliability of the socio-economic assessment and suggests that the applicant's methodology is fundamentally inadequate to understand or address the impacts on island communities.

There remains significant uncertainty regarding the proposal's compliance with the necessary policy and statutory duties relating to island communities. This uncertainty stems from a failure to provide the robust socio-economic evidence required by GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities must rest on sound evidence and adopt a precautionary approach where data is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and given due weight through meaningful engagement from the earliest stages of a project through to its conclusion. In this case, the applicant acknowledged the need for particular scrutiny of island communities but has not undertaken the comprehensive assessment necessary to understand the proposal's effects upon them. Consequently, it has not demonstrated that the development is compatible with the sustainability of these communities, nor has it shown that the statutory duties owed to them have been properly discharged. Given these deficiencies, the proposal fails to meet the required planning and statutory standards for the protection and consideration of island communities.

1.1.443 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when there is a possibility that the project may have an adverse effect on the integrity of a protected site. Their inclusion in this application indicates the applicant's recognition of potential impacts that cannot be definitively ruled out. Importantly, the submission of these documents also acknowledges that the Scottish Ministers might ultimately reach a different conclusion regarding the presence of adverse effects. In this context, the applicant's approach demonstrates an awareness of the sensitivities involved and provides a framework for mitigation and compensation measures should they be deemed necessary. This reflects a responsible stance, though the final determination of adverse impact remains subject to ministerial assessment.

When considering developments that may impact protected habitats, it is important to recognise that mitigation, compensation measures, and future monitoring plans, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike measures that may reduce or offset potential harm, these proposals cannot substitute for the fundamental evidential standard required to demonstrate that a development will not adversely affect the integrity of a protected site. This distinction underscores the necessity for applicants to provide robust, conclusive evidence at the outset, rather than relying on subsequent interventions.

The legal framework governing such consent is exacting and unequivocal. Under the Habitats Regulations, consent may only be granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site. This high evidential threshold is non-negotiable unless the strict derogation tests are satisfied, which themselves impose rigorous conditions. The responsibility to demonstrate compliance with these statutory tests rests squarely with the applicant, emphasising that the burden of proof is both substantive and procedural.

This legal context is reinforced by related policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. These policies collectively affirm the imperative to protect marine and terrestrial habitats through careful planning decisions that adhere to statutory requirements. The cumulative effect of these legal and policy instruments ensures that development consent processes maintain a high standard of environmental protection, reflecting the critical importance of conserving biodiversity and ecosystem integrity.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant’s own derogation documents, which collectively reveal an absence of the requisite certainty regarding compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.444 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that it fails to provide a complete and coherent evaluation of the project's impacts. By considering only part of the development before the Scottish Ministers—specifically excluding the export cable corridor and onshore transmission works—key components without which the wind farm cannot function are omitted from the initial decision-making process. This fragmentation means that the cumulative effects of the entire project are not assessed together, undermining the ability to fully understand and mitigate potential adverse impacts at this critical stage.

Such a piecemeal method of assessment is legally and procedurally flawed. As established in the Raeshaw Farms case, the courts have affirmed that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual effects may appear less significant. The current approach of deferring essential elements to later applications contravenes this principle by effectively salami-slicing the project. This risks masking the true scale and significance of the development's impacts, thereby compromising the integrity of the planning process.

In conclusion, the assessment as presented cannot be considered comprehensive or consistent with established legal precedent. It is essential that the export cable corridor and onshore transmission works be included within the scope of the initial evaluation to ensure that the project's effects are fully and transparently considered. Only then can the decision-making process properly reflect the entirety of the proposed development and its implications.

The cumulative impact assessment presented in the Environmental Impact Assessment relies heavily on baseline evaluations that have themselves been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. This foundational underestimation compromises the integrity of the cumulative assessment, as it effectively begins from an already diminished baseline. Consequently, the combined effects of the current proposal, when considered alongside existing, consented, and foreseeable developments, are systematically undervalued.

Given that the cumulative assessment is contingent upon these flawed baseline conclusions, the overall appraisal cannot be regarded as reliable. The true extent of the cumulative impacts is therefore likely to be greater than that indicated, with significant implications for the adequacy of proposed mitigation measures. It follows that decision-makers should exercise caution in accepting the current assessment's findings without further, more rigorous baseline analyses to ensure that cumulative effects are accurately identified and addressed.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), alongside the requirements set out by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it is evident that the cumulative and in-combination effects of the proposed development, including those arising from the project as a whole, have not been comprehensively demonstrated or reliably assessed within the documentation provided. This omission raises concerns about the adequacy of the environmental appraisal underpinning the proposal.

In light of these shortcomings, it is imperative that the deferred works associated with the project are explicitly considered and addressed during the determination process. Failure to do so risks overlooking significant environmental impacts and undermines compliance with pertinent planning policies and regulatory requirements. Accordingly, a thorough and transparent evaluation of all aspects of the project, including deferred elements, should be mandated to ensure a robust and policy-compliant decision-making outcome.

1.1.445 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The environmental information submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. The Environmental Impact Assessment (EIA), while comprehensive in scope, falls short of the required standard of sufficiency. Specifically, the assessment identifies potential pathways to significant effects but fails to investigate these thoroughly or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks demonstrable application of its integrity test; and the socio-economic assessment omits any place-based analysis of the islands directly affected. Furthermore, the application frequently depends on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Consequently, the Scottish Ministers are constrained to base their decision solely on the evidence currently before them, and the applicant has not shown that this environmental information meets the adequacy threshold necessary for proper determination.

1.1.446 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment's comprehensiveness in addressing the real and tangible impacts on Islay's residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community's area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment acknowledges significant effects on Iona, particularly along the West Coast and at key locations such as Dùn Ì, its highest point. However, this recognition falls short of fully capturing the scale and extent of these impacts. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with a direct orientation towards the development area and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, a substantial visual presence. Despite requests from Historic Environment Scotland for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, no visualisations are provided from significant vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines a comprehensive understanding of the visual and heritage impacts on Iona's internationally important monastic landscape, which is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape.

Community concerns further highlight shortcomings in the applicant's evaluation. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect that was never fully assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres. The proposed turbines would exceed this height by approximately 194 metres and be situated at roughly two-thirds of that distance, intensifying their visual dominance. Taken together, these factors demonstrate that the applicant's assessment underestimates the significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and reliability of the environmental and social impact evaluation.

While the applicant acknowledges significant effects on certain areas such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort, their assessment relies heavily on distance-based mitigation assumptions. For example, the Wilderness and Gribun Rocks coastal area is deemed to experience only small scale change due to its viewing distance exceeding 30 kilometres. This approach overlooks the fact that the Ross of Mull South coastal area, assessed as having High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude, despite the applicant's acceptance of significant impacts on key community points.

Similarly, across Mull, significant effects are admitted on Core Paths and within Local Landscape Areas including Central, South and West Mull. The Loch na Keal National Scenic Area, notable for its High sensitivity extending from 21 to 33 kilometres, is nonetheless assigned no greater than Medium magnitude. Such assessments appear inconsistent, particularly given the importance of these landscapes to local communities and the visitor experience, which the applicant recognises but does not fully translate into higher impact ratings.

Moreover, the applicant's evaluation does not sufficiently account for the economic and community implications for Mull's west-facing tourism sector. This includes wildlife boat operators and accommodation providers whose livelihoods depend on the largely unspoiled Atlantic seascape. These communities, integral to the area's character and economy, have not been subject to detailed place-based assessment, leaving a significant gap in understanding the full consequences of the proposed development on these sensitive coastal landscapes and their dependent populations.

The applicant's assessment recognises effects on the Loch na Keal National Scenic Area, within which the island of Ulva is situated, acknowledging its designation and the shared landscape qualities at stake. Ulva is a community-owned island currently undergoing regeneration, characterised by a small, re-establishing population whose recovery depends fundamentally on the preservation of its unspoilt seascape and setting. However, no specific assessment has been undertaken regarding the impacts on Ulva's community or landscape qualities, representing a notable omission.

Similarly, the applicant addresses Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development. Despite Staffa's status as one of the most celebrated small islands in Europe and its acknowledged panoramic maritime qualities, the applicant concludes that effects at this distance would be small and not significant. This conclusion is drawn notwithstanding NatureScot's request to assess effects up to around 30 kilometres, implying that Staffa lies beyond the suggested assessment boundary, yet the importance of its seascape qualities may warrant closer consideration.

The Jura National Scenic Area, situated approximately 28 to 32 kilometres from the development, is described by the applicant as having high sensitivity. The magnitude of impact is assessed as medium to low, tempered by factors such as distance, scale, and retained landforms. Nonetheless, the designation of Jura hinges on its wild and undeveloped Atlantic character, which could be more vulnerable to change than the assessment suggests.

Lastly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances between 35 and 40 kilometres, receive a similar treatment in the assessment, with no indication of significant effects.

In summary, while the applicant's assessment identifies potential effects on several designated landscapes, it appears to underestimate or omit detailed consideration of impacts on vulnerable island communities such as Ulva and significant seascape qualities of celebrated islands like Staffa. The reliance on distance thresholds and

assumptions of limited magnitude may inadequately reflect the sensitivity and value of these areas, thereby undermining the protection of their natural and cultural attributes.

The applicant's assessment significantly understates the magnitude of change and impact on the sensitive and distinctive landscape character of Tiree, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, located approximately 35 kilometres from the development, has been attributed a Low magnitude of change despite being assessed as having High sensitivity. This is a critical inconsistency because Tiree is an exceptionally low-lying island whose entire landscape character is defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, which underscores the scale of vertical elements introduced by turbines reaching up to 335 metres in height. Such turbines would represent unprecedented vertical structures in Tiree's open oceanic horizon and seascape, fundamentally altering the island's distinctive character. Given this context, the conclusion that the magnitude of change is Low exemplifies a severe understatement of effects. Therefore, the applicant's evaluation cannot be regarded as reliable, and a reassessment that properly acknowledges the pronounced landscape impact on Tiree is necessary.

While the applicant's assessment acknowledges certain visual impacts and proposes distance-based mitigation measures, these do not adequately address the effects experienced by mainland and island communities with direct views of the development. For example, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic seascapes along the Hebridean coast that attract visitors and support the local economy. The quality of these seaward panoramas is precisely the type of receptor for which the applicant's distance-based mitigation falls short, as it fails to consider the significance of such valued views in sustaining tourism and community identity.

Moreover, the assessment omits any examination of effects on the community-owned island of Gigha, whose residents' purchase of the island has become a national symbol of island regeneration. Facing the development waters to the east, Gigha's delicate social and economic balance is vulnerable to unassessed impacts. Similarly, the chain of communities along the west coast of Kintyre, along with the Treshnish Isles and adjacent mainland coasts, rely heavily on the open Atlantic seascape that encompasses views towards Islay, Jura, and beyond. The absence of consideration for these interconnected seascape receptors compromises the comprehensiveness of the assessment and risks overlooking significant adverse effects on the character and economic resilience of these communities.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres. As demonstrated in the evidence, wherever a highly sensitive receptor is identified beyond this threshold, the assessment reduces the magnitude of change and correspondingly diminishes the perceived effect. This approach results in no place-based assessment being undertaken for the communities residing in these more distant locations, despite their exposure to potentially significant impacts.

Such systematic moderation undermines the integrity of the environmental assessment by failing to fully acknowledge or evaluate the effects experienced by these distant but sensitive receptors. By discounting impacts solely on the basis of distance without detailed, locality-specific analysis, the assessment risks overlooking meaningful environmental and social consequences for affected communities. This methodological limitation calls into question the robustness and comprehensiveness of the applicant's conclusions regarding the environmental effects beyond the 20-kilometre boundary.

1.1.447 Personal Observations

In addition to the planning matters above, I am personally concerned because: Deep concern for the cultural impact on an area of historical and cultural importance that I frequent.

Based on my own local knowledge, I also wish to highlight that: The impact on wildlife and the cultural landscape MUST be considered to a greater extent.

Finally, I would also ask the Scottish Ministers to consider: The impact on the landscape, the environmental consequences, the wildlife, and the destruction of a culturally significant area of historic importance.

1.1.448 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy criteria governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, published analyses of the applicant's documentation reveal that these impacts have been underestimated, and the necessary heritage assessment has not been completed. While the effects on the island communities involved were identified, they have never undergone proper assessment. Additionally, the ecological requirements have not been demonstrated to be achievable. It is also noteworthy that only a portion of the project falls under the jurisdiction of the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence.

Should the Ministers consider granting consent, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the applications should be determined only following a public inquiry, which would enable a thorough examination of the concerns outlined in this representation. Regardless of the decision reached, it is also urged that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their final reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 145
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), pertain to the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning some 448 square kilometres of marine environment north-west of Islay and west of Colonsay. This location lies around 21 kilometres from Iona and is proximate to the islands and coastal communities of the southern Hebrides.

I request that this letter be recognised as a formal objection, that I be duly registered as an objector, and that I receive notification of the decision regarding these applications.

The objections detailed herein are grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing such proposals. It is imperative to note that the onus of proof lies squarely with the applicant. The applicant must provide sufficient evidence to satisfy all applicable tests and requirements. Objectors bear no responsibility to substantiate the contrary. Upon careful evaluation of the information submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications ought to be refused consent for the reasons elaborated in the subsequent sections.

1.1.449 Seascape, Landscape and Visual Effects

There is a fundamental uncertainty regarding the applicant’s assessment methodology, particularly in relation to how distance thresholds are treated. Notably, the written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and its appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or visibility.

Further examination of the applicant’s own documents underscores the influence distance has on their judgements. For instance, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This demonstrates a clear, though implicit, distance-related grading of impact severity.

The implication of this approach is that the protective tests required by Scottish Ministers are being applied to inputs that are systematically understated. When

magnitude is moderated precisely at distances where the most sensitive designated landscapes are located, the resulting conclusions cannot be regarded as a reliable description of the effects for which consent is sought. This raises significant concerns about the robustness and accuracy of the assessment on which the decision-making process depends.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

The proposal fails to comply with the requirements of key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite recognising these effects, the applicant has not demonstrated that its conclusions regarding their scale are consistent with its own assessment methodology. Furthermore, no evidence has been provided to show compliance with the policies protecting nationally important landscapes and seascapes. On this basis, it is clear that the proposal does not meet the necessary policy standards and should not be supported.

1.1.450 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets encompasses multiple qualities, notably pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, all experienced dynamically rather than from fixed viewpoints. However, Historic Environment Scotland's consultation responses, as documented within the application, indicate that the assessment has not fully captured these broader cultural and experiential qualities, specifically requesting additional viewpoints to ensure these aspects are properly represented. This suggests that the baseline understanding of the heritage assets may be incomplete, potentially leading to an underestimation of the heritage impacts. It is therefore essential that the assessment fully integrates these wider cultural landscape attributes to provide a comprehensive evaluation of the proposed development's effects.

The proposed application fails to satisfy the critical requirements set out in NPF4 Policy 7, notably section (h) relating to scheduled monuments, as well as subsections (c) and (d) concerning their settings. This deficiency extends to the provisions of GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a robust framework for the protection of heritage assets. The absence of a comprehensive assessment that addresses these policy elements quantitatively undermines the applicant's position and the application's overall compliance.

Moreover, the applicant has not provided adequate evidence to demonstrate that the cultural significance of heritage assets of international and national importance, along with their settings, will be safeguarded throughout the development process. This shortfall is significant, as it leaves the Scottish Ministers without the necessary information to evaluate whether the proposed measures are sufficient to mitigate potential impacts. The lack of such an assessment is a material omission that fundamentally weakens the application's justification in terms of heritage conservation.

In conclusion, the application's failure to meet the established policy requirements for the protection of heritage assets and their settings renders it unacceptable in its current form. Without a detailed and convincing assessment demonstrating the protection of these assets, the proposal cannot be supported. It is therefore respectfully urged that the application be refused on the grounds of non-compliance with essential heritage protection policies.

1.1.451 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant's own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The applicant's socio-economic assessment methodology falls short when compared to the detailed place-based analyses typically employed to understand and mitigate impacts on island communities. While the assessment in Chapter 18 provides a thorough examination of potential port communities, it neglects to apply an equivalent level of scrutiny to the island communities directly facing the development. Notably, the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, yet no specific assessment of island habitability was undertaken. Despite this, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a finding that lacks the rigour of place-based evidence.

This conclusion fails to recognise that small island economies differ markedly from regional averages. Their economic structures are often concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Dependence on rising visitor numbers does not mitigate this vulnerability; rather, it intensifies the community's reliance on the very attributes that may be compromised by the development. Therefore, the assertion of low sensitivity, made without detailed, location-specific analysis, amounts to an unfounded assumption rather than an evidence-based judgment. Such methodological inadequacy undermines the reliability of the assessment and diminishes confidence in the adequacy of proposed mitigation measures for island communities.

1.1.452 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application therefore signals the recognition by the applicant of potential harmful impacts, while also presenting proposed mitigation measures intended to address these concerns.

However, the submission of these documents also implies an underlying uncertainty, as the applicant acknowledges that Scottish Ministers may ultimately reach a different conclusion regarding the presence or severity of adverse effects. This acknowledgement underscores the need for careful scrutiny of the proposed compensation and derogation measures to ensure they are adequate and effective

in safeguarding the protected guillemot population and the integrity of the designated site.

The legal framework governing developments that may affect protected habitats and species is clearly defined under the Habitats Regulations. These regulations stipulate that consent for such proposals can only be granted if the competent authority is satisfied that the development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are met. Crucially, the law requires that consent may only be lawfully granted where no reasonable scientific doubt remains regarding the absence of adverse effects. This places a significant evidential burden on the applicant to demonstrate compliance. Importantly, mitigation measures, compensation proposals, and future monitoring cannot, in isolation, be relied upon to satisfy the statutory tests set out by the regulations.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as specific policies within the Scottish Government's National Planning Framework 4 (NPF4), namely Policies 3, 4(b), 4(e), and 4(f). These policies collectively underpin the necessity for rigorous scientific evidence and a precautionary approach in decision-making relating to developments affecting protected natural environments. Their inclusion underscores the integrated approach between habitat protection legislation and marine spatial planning objectives, ensuring that environmental considerations are central to the assessment process.

Given the high standard of proof required by both law and policy, it is essential that any application seeking consent under these provisions presents robust, unequivocal scientific evidence demonstrating no likely adverse effect on the integrity of the site. Without this, the statutory tests are not met, and consent should not be granted. This framework serves to safeguard protected habitats effectively, ensuring that environmental protection is not compromised by uncertain or insufficient evidence. It is therefore appropriate that decision-makers apply these legal and policy requirements stringently in their assessments.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of

internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.453 Cumulative and In-Combination Effects

The current assessment process is fundamentally flawed as it considers only a portion of the project before the Scottish Ministers, specifically excluding the export cable corridor and onshore transmission works. These components are essential for the operation of the wind farm but are deferred to later applications. Consequently, the cumulative effects of the entire project are never evaluated together, resulting in an incomplete and fragmented assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts with individually diminished impacts. By deferring significant elements to subsequent consenting processes after the principal decision, the assessment undermines both procedural integrity and comprehensive environmental evaluation.

The cumulative impact assessment relies directly on the findings of the underlying Environmental Impact Assessment, including the landscape, heritage, and socio-economic evaluations. As these foundational assessments have been demonstrated to understate the effects, the cumulative assessment consequently adopts this diminished baseline. This results in an overall underestimation of the combined impacts arising from the proposed development in conjunction with other existing, consented, and foreseeable projects. Therefore, the cumulative effects reported cannot be considered reliable or reflective of the true extent of impact.

1.1.454 Public Engagement, Site Selection and Environmental Information

The applicant invites Scottish Ministers to attribute significant weight to the site-selection process; however, this process has been fundamentally compromised by deficiencies in public participation. The consultation accompanying the application encompasses many thousands of pages of highly technical material, yet the consultation period coincided with the busiest months for island communities. During this peak visitor season, residents are engaged in continuous work, and access to specialist advice is severely limited. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources. This imbalance has effectively restricted the capacity of the affected communities to engage meaningfully with the proposals.

National policy and international principles underscore the necessity for effective public participation in decisions of such magnitude. GEN 18 of the National Marine Plan, alongside the Aarhus Convention’s requirements, mandates that those impacted must have a realistic and fair opportunity to contribute to the decision-making process. The conditions under which the local communities have been expected to respond fall short of this standard, undermining the legitimacy of the consultation. It is therefore imperative that Ministers recognise these shortcomings in participation when considering the representations submitted, as the quality and

timing of public engagement bear directly on the integrity of the entire site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.455 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment inadequately addresses the direct and significant effects on Islay's Atlantic-facing communities, which confront the nearest edge of the development area. Rather than evaluating Islay as an affected island community in its own right, the application primarily considers it only in terms of its potential role as a direct project location, thereby neglecting any place-based analysis of impacts on local setting, economy, or community life.

Similarly, the assessment underestimates the effects on Colonsay and Oronsay, where the seaward outlook integral to daily life faces the array directly. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community's area, suffers from the same gaps identified in the heritage assessment, particularly concerning the treatment of its

open maritime setting. Together, these omissions undermine the reliability of the environmental and heritage impact evaluation submitted.

While mitigation measures are proposed, the applicant's assessment substantially underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development area and extensive visibility spanning approximately 21 kilometres. Turbines would extend across around 39 degrees of the horizon, resulting in a moderate and significant overall effect that is neither adequately addressed nor mitigated. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors across much of the island, including at Dùn Ì, its highest point. The island's internationally important monastic landscape—comprising the Abbey, the Nunnery, and high crosses—is intrinsically linked to pilgrimage and arrival by sea, yet visualisations omit key viewpoints such as from the ferry crossing and the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, as requested by Historic Environment Scotland. Community concerns are pronounced: a household consultation revealed that 92 per cent of respondents object to the proposal, and despite the applicant's consultants identifying habitability as a potential effect pathway, no assessment of this impact has been undertaken. The scale of the turbines' visual dominance can be further appreciated by comparison with Ben Hynish on Tiree, a 141-metre landmark visible from Iona at around 33 kilometres; the turbines would exceed this height by approximately 194 metres at roughly two-thirds of that distance, markedly increasing their perceived scale. Taken together, these factors demonstrate that the applicant's assessment does not fully capture the magnitude or significance of impacts on Iona, thereby undermining the accuracy and robustness of the environmental and social impact evaluation.

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators

and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

The applicant's assessment significantly underestimates the impact on Tiree's distinctive landscape, resulting in an unreliable evaluation of effects. The South Tiree coastal area is identified as having High sensitivity at a distance of approximately 35 kilometres, yet the magnitude of change is attributed as Low. This assessment fails to recognise the fundamental characteristics of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. With its

highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall would create vertical structures unprecedented in the island's seascape. Given that Tiree's character is based on an open oceanic horizon, this scale of development would cause a far greater magnitude of change than acknowledged. Therefore, the conclusion of Low magnitude is a clear understatement for such an exposed and sensitive receptor, undermining the credibility of the applicant's assessment.

The applicant's assessment notably omits consideration of Gigha, a community-owned island that has become a national emblem of island regeneration following its purchase by local residents. Positioned to the east of the proposed development, Gigha's community and economy are delicately balanced and closely tied to the surrounding waters, yet no evaluation of potential impacts on this sensitive island has been provided.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers sweeping panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the type of visual receptor that the applicant's distance-based moderation approach seeks to diminish, raising concerns that important effects on this key viewpoint have been underestimated or overlooked.

Moreover, the chain of communities along the west coast of Kintyre depends heavily on the character and visitor economy shaped by the open Atlantic seaboard, encompassing views towards Islay, Jura, and beyond. The Treshnish Isles and neighbouring small islands and mainland coasts with direct sightlines to the development site share this intrinsic connection to the seascape, yet their potential exposure and economic reliance have not been adequately assessed. This lack of comprehensive evaluation compromises the robustness of the applicant's overall seascape and socio-economic impact appraisal.

The applicant's environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.456 Personal Observations

In addition to the planning matters above, I am personally concerned because: my family has a long association with Tiree and we are about to move there permanently. I am in favour of wind energy in general, however it would seem we in Scotland produce enough of it, and it is certainly not worth degrading our already-

precarious marine environment for - it would seem- further degradation to fragile marine habitats and multiple impacts on the lives and livelihoods of islanders.

Based on my own local knowledge, I also wish to highlight that: yes, the marine environment around the Hebrides should receive far greater consideration, because the seas are already seriously depleted of marine life. Despite much of the area being designated MPA (Marine Protection Area) our oceans face threats from fish farming, continued bottom-trawling and dredging, warming seas, plastic detritus. Over the past 30 years in Tiree I've noted far fewer fish in inshore waters and a steep decline in seabird numbers. I value these places but this is not about me: the intrinsic life of our oceans is at stake and large multi-national conglomerates should not be degrading them further for shareholder profit (or indeed any other reasons)

Finally, I would comment that Scottish ministers should not be jumping at huge foreign investment opportunities: they should be protecting their beautiful land, seas and communities for now and future, as well as listening properly to the folk who vote for them.

1.1.457 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant’s documentation reveal that the extent of these impacts has been understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers’ consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 146
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.458 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the current proposal aligns with the impact criteria established by National Planning Framework 4 (NPF4) Policy 11, despite the policy’s general support for renewable energy development. It is essential to recognise that this support is contingent upon compliance with specific impact tests, including those relating to communities, landscapes, seascapes, and other sensitive receptors as set out in Policy 11(c), (d), and (e). Without clear evidence demonstrating adherence to these criteria, the proposal’s legitimacy under NPF4 is called into question.

Further examination reveals that the proposal is in conflict with these requirements. It would lead to significant adverse effects on nationally designated landscapes and seascapes, an outcome that contradicts the protective intentions of NPF4. Moreover, there is an absence of satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, a factor critical to maintaining the integrity of the historic environment. The safeguarding of island communities, which Policy 11 seeks to ensure, also remains unproven, adding to the concerns surrounding the proposal.

Finally, the ecological assessments submitted with the proposal fail to provide assurance that the necessary tests can be met, further undermining confidence in its compliance with Policy 11. Taken together, these unresolved issues indicate that the

proposal does not meet the comprehensive impact criteria required by NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy developments in this context. It is therefore incumbent upon the decision-making authority to carefully consider these shortcomings before granting consent.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) to safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on their designated qualities. Additionally, it does not meet the requirements of Policy 7, including Policy 7(h) relating to scheduled monuments and Policies 7(c) and 7(d) concerning the setting of historic assets. Furthermore, the proposal does not demonstrate adequate protection for island communities as required, nor does it satisfy the ecological tests set out in Policy 3 on biodiversity. Taken together, these shortcomings indicate that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, fail to protect the cultural significance of scheduled monuments and their settings, and fall short in safeguarding the natural environment in accordance with NPF4.

The applicant's evidence acknowledges that, insofar as terrestrial development plans are relevant to the land-based effects of the proposal, the same conflicts identified with the Argyll and Bute Local Development Plan 2 arise. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that these policies are designed to protect. This recognition confirms that the proposal does not align with the objectives set out within the local development plan framework.

Furthermore, the applicant has not demonstrated that the proposal is consistent with the development plan or with the National Planning Framework 4 when considered in its entirety. The admitted conflicts with key policy aims underscore the fundamental inconsistency of the proposal with the established planning framework. On this basis, the proposal should be regarded as contrary to the relevant terrestrial development plan policies.

1.1.459 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant's own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. Furthermore, the applicant's documentation acknowledges the influence of distance on judgements; for example, an assessment of a coastal area over 30 kilometres away concludes that the scale of change is small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes lie results

in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the effects the Scottish Ministers are being asked to consider.

The visualisation materials submitted in support of the application are inherently limited in their ability to convey the true scale and impact of the development as experienced on site. According to NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections share these same limitations, as they are technical renderings embedded within the visualisation rather than independent corrections or enhancements. Consequently, reliance on these materials alone may lead to an underestimation of the development's visual effects, and this should be carefully considered in the assessment process.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

Beyond the temporal scope of the 35 years, it is also crucial to acknowledge that policy considerations do not treat this operational life as a limit on harm. The decision to grant consent for this development effectively constitutes a determination that the seascape is suitable for wind farm use, accepting the associated changes to its character. Therefore, even if mitigation could reduce some adverse effects, the permanent introduction of lighting remains a key factor in altering the night-time environment. In conclusion, the unavoidable lighting effects represent a material and lasting impact on the seascape character that must be carefully weighed in the planning balance.

The applicant's proposals fail to demonstrate adequate mitigation in relation to the significant effects identified on nationally important landscapes and seascapes. While some measures have been suggested, these are insufficient when assessed against the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The absence of robust mitigation measures undermines confidence that the proposal can appropriately safeguard the visual and environmental qualities these policies seek to protect.

Furthermore, the applicant has not substantiated that its conclusions regarding the scale of the accepted effects align with the methodology employed in its own assessments. This lack of consistency raises serious concerns about the reliability of the environmental impact evaluation and, by extension, the proposal's compliance with key planning policies aimed at conserving nationally important landscape and seascape interests. In light of these shortcomings, the proposal does not meet the necessary policy standards and should not be supported.

1.1.460 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach necessitates more than a description of visual changes. It requires a thorough evaluation of whether alterations to setting affect the contribution that setting makes to the cultural significance of the asset, and crucially, whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be directly equated with adverse impact.

A published Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not demonstrate how the integrity of setting has been evaluated in accordance with the applicant's own adopted methodology. The assessment focuses on describing visual elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains intact. However, the essential evaluative step required by the methodology—demonstrating how these visual factors influence the cultural significance and integrity of setting—is absent in all the examined worked examples. This omission calls into question the robustness of the assessment's findings.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.461 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape, seascape, cultural heritage, tranquillity and remoteness. Such attributes are fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed examination of potential port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Notwithstanding this absence, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects. This approach fails to address the particular circumstances of the islands and thereby undermines the reliability of the conclusions drawn.

Small island economies cannot be accurately represented as regional averages, given that their economic structures are often concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers intensifies reliance on these qualities, which are precisely those at risk from the proposed development.

Therefore, the assertion of low sensitivity to tourism impacts, reached without any place-specific analysis, is unfounded and amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw in the applicant's socio-economic assessment methodology calls into question its adequacy in understanding or mitigating the effects on island communities.

The proposal fails to meet essential planning and statutory requirements concerning island communities, notably neglecting the thorough assessment demanded by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions affecting island communities be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be carefully evaluated and given due weight through meaningful engagement from the earliest stages through to the conclusion of any decision-making process.

Despite recognising that island communities warrant particular scrutiny, the applicant has not conducted the necessary assessment to comprehend fully the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with sustainable island communities, and as such, the applicant has not satisfied the statutory duties owed to these populations. This omission represents a significant shortfall in meeting the standards set by relevant policy and legislation, undermining the integrity of the decision-making framework.

In conclusion, given the quantifiable lack of assessment and failure to discharge statutory obligations, the proposal cannot be considered compliant with the comprehensive planning and statutory duties designed to protect island communities. It is therefore appropriate that the proposal be refused on these grounds to ensure that the interests and sustainability of island communities are properly safeguarded.

1.1.462 Ecology, Biodiversity and Habitats Regulations

The development area and its surrounding waters are of considerable ecological importance, containing Priority Marine Features and Annex I habitats within the site itself. This environment also supports a range of protected species, including seabirds, marine mammals and the basking shark, all of which are sensitive to disturbance.

The proposed development would introduce extensive construction, operational and decommissioning activities on a very large scale, persisting for decades. Such prolonged and intensive activity poses a significant risk of adverse environmental effects on these important marine features and protected species, warranting careful and thorough consideration.

The practical consequence of the applicant's submission is that there is an acknowledged risk of adverse effects on a protected site, specifically the North Colonsay and Western Cliffs Special Protection Area, which supports a significant guillemot population. By providing a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, the applicant signals an awareness

that the project could impact the integrity of this designated area. This recognition is crucial, as it frames the application within the context of potential environmental harm that requires careful consideration.

These documents are not standard procedural submissions; they are specifically prepared for circumstances where adverse effects cannot be ruled out. Their presence in the application package demonstrates that the applicant is seeking to address these impacts through derogation provisions, which are legal mechanisms allowing certain activities that might otherwise be prohibited due to their environmental consequences. The compensation plan, targeted at the guillemot population, reflects an effort to mitigate potential ecological damage, underscoring the applicant's intention to manage and reduce harm to protected species.

Nevertheless, it is important to note that the applicant's own approach acknowledges a degree of uncertainty, as the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or significance of adverse effects. This uncertainty reinforces the need for a rigorous and cautious assessment process. The submission of these documents, therefore, constitutes a significant aspect of the application and warrants thorough scrutiny to ensure that the integrity of the protected site is safeguarded in accordance with relevant policies and statutory obligations.

The applicant's evidence establishes that, under the Habitats Regulations, development consent may only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are satisfied. This places a high evidential burden on the applicant to demonstrate the absence of adverse effects; mitigation, compensation measures, and future monitoring alone cannot satisfy the statutory requirements. This legal framework is supported by the provisions of GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Taken together, these policies and regulations emphasize a stringent and precautionary approach to development affecting protected habitats and species. Consequently, any consent must be based on robust, conclusive scientific evidence meeting this exacting standard.

The practical consequence of the applicant's failure to meet the statutory tests is that the proposed development risks causing harm to internationally important habitats and species, thereby undermining the legal basis for granting consent. Without clear evidence that these protections can be assured, there is a tangible threat to the integrity of designated ecological features.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the ability to satisfy the statutory requirements. This uncertainty indicates that the necessary safeguards for these internationally important ecological assets have not been adequately demonstrated or guaranteed by the applicant.

Given this lack of demonstrable compliance with the legal protections in place, the application cannot be considered to meet the necessary statutory tests. Consequently, granting consent in these circumstances would be contrary to the

obligations to protect internationally important habitats and species, and therefore should be refused.

1.1.463 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

The practical consequence of relying on the current cumulative impact assessment is that it fails to accurately reflect the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the cumulative assessment is fundamentally dependent on the baseline conditions established in the preceding Environmental Impact Assessment. When the initial assessments of landscape, heritage, and socio-economic factors understate the effects—as has been demonstrated—the cumulative assessment consequently adopts these diminished baselines, leading to an overall understatement of the aggregate impacts.

This issue is critical because an inaccurate baseline distorts the starting point from which cumulative effects are measured, thereby undermining the reliability of the entire assessment. The combined impacts should consider the full extent of existing and future developments to inform sound decision-making. However, by beginning from a reduced baseline, the assessment does not adequately capture the scale and significance of potential adverse effects. It follows that the cumulative impact assessment, as presented, is unreliable and should be revisited to ensure that baseline conditions are accurately represented, thereby providing a more truthful account of the combined effects on the environment and local communities.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and cumulative effects. The proposal fails to demonstrate that the

cumulative and in-combination effects have been comprehensively identified and assessed, in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed, leaving a gap in the decision-making process. It is therefore essential that the assessment of these deferred elements be clearly and explicitly considered before any determination is made.

1.1.464 Public Engagement, Site Selection and Environmental Information

There remains significant uncertainty regarding the adequacy of public participation in the site-selection and application stages of this proposal. The applicant places considerable weight on the site-selection process, making the quality of engagement during that stage directly relevant to the legitimacy of their case. However, the deficiencies observed in public involvement at earlier stages have persisted into the current application, which comprises an extensive volume of technical documentation.

The timing of the consultation period exacerbates these concerns. It has coincided with the busiest months for island communities, when residents are heavily engaged in continuous work throughout the visitor season, and access to specialist advice is limited. In contrast, the applicant has had years to prepare their submission, supported by substantial professional and financial resources. This imbalance raises questions about whether affected communities have been afforded a realistic and meaningful opportunity to participate in decisions of such significance.

National policy and international principles provide clear guidance on public participation. GEN 18 of the National Marine Plan, together with the Aarhus Convention’s emphasis on effective involvement, require that those impacted by proposals have a genuine chance to influence outcomes. The conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers carefully weigh these participation concerns when considering the representations put forward.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient environmental information to make a fully informed decision on the application. The assessment fails to adequately investigate all identified pathways to significant effects, relying instead on methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks a place-based analysis of the islands directly affected.

Furthermore, the application depends in some instances on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding issues. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be understood before the application is determined. The regulatory framework is clear that these matters must be resolved

through the evidence presented at the time of decision-making, not deferred to a later stage.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to discharge their statutory duties. Without sufficient and comprehensive evidence, there is a risk that the decision will be made without a full understanding of the environmental impacts, which undermines the purpose of the EIA process and the statutory requirements it seeks to uphold.

1.1.465 Effects on Local Area

There is significant uncertainty regarding the applicant's assessment of the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Notably, Islay and Colonsay are the closest inhabited islands to the proposed development area, which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay. However, the application approaches Islay primarily as a potential project location rather than as an affected island community in its own right. This perspective results in an absence of any place-based evaluation of how the development might impact Islay's Atlantic-facing communities, their setting, economy, or community life, thereby undermining the reliability of the environmental and heritage impact appraisal.

For Colonsay and Oronsay, the situation is no less concerning. The seaward outlook, which profoundly shapes daily life on these islands, directly faces the proposed array. Of particular importance is the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline. This site is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be ruled out. Such an admission highlights the potential for significant and irreversible environmental effects, yet the wider implications for the community and natural heritage appear insufficiently addressed.

Moreover, Oronsay Priory, a scheduled monument of national importance, is situated within this same community area. The concerns previously identified regarding gaps in the heritage assessment apply equally to the evaluation of the Priory's open maritime setting. The failure to adequately consider the impact on this nationally significant heritage asset further calls into question the thoroughness and robustness of the applicant's environmental and heritage impact evaluation. Taken together, these points indicate that the assessment underestimates the magnitude and significance of effects on these island communities, thus raising serious doubts about the overall reliability of the application's conclusions.

The applicant's assessment acknowledges that the Sound of Iona holds high sensitivity, with direct orientation towards the proposed development area and extensive visibility. The Coastal Character assessment identifies a large geographical extent of change, noting effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant. The turbines would be visible across approximately 39 degrees of the horizon, at a distance of about 21 kilometres. Similarly, the West Coast of Iona is recognised as

highly sensitive, with widespread visibility, and the applicant accepts significant effects on residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, this acknowledgement understates the scale and significance of the impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of heritage importance at an international level. The applicant's own baseline recognises the significance of this heritage in terms of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a crucial vantage point for assessing heritage impact.

Community concerns further highlight the inadequacy of the applicant's evaluation. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this, habitability—identified by the applicant's consultants as a potential pathway of effect on the community—was never formally assessed. This omission undermines the accuracy and completeness of the social impact evaluation.

The perceived scale of the turbines is also underestimated. For comparison, Ben Hynish on Tiree, standing 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres, despite the turbines being located roughly two-thirds of that distance from Iona. This illustrates that the visual dominance of the turbines would be substantially greater than implied.

In conclusion, the applicant's assessment significantly underrepresents the visual, community, and heritage impacts on Iona, compromising the reliability of the environmental and social impact evaluation and warranting a more thorough and robust analysis.

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery. The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change resulting from the proposed development. This juxtaposition of high sensitivity with low impact magnitude appears incongruous, particularly given the distinctive environmental context of Tiree. The island's exceptional low-lying topography, with its highest elevation at Ben Hynish reaching only 141 metres,

underpins a landscape character dominated by expansive sea and sky. Such a setting is inherently sensitive to vertical intrusions.

Given that the proposed turbines would reach heights of up to 335 metres, more than twice the island's highest natural point, their introduction would constitute a profound alteration to Tiree's open oceanic horizon. This scale of vertical structure is without precedent in the seascape and, accordingly, the applicant's conclusion of a Low magnitude of change does not adequately capture the likely visual and experiential impacts. The assessment thus significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This approach has a practical consequence: significant impacts on these distant communities are understated or overlooked entirely. Such a method fails to provide a comprehensive and accurate understanding of the environmental effects experienced by all affected populations.

Evidence demonstrates that wherever highly sensitive receptors exist beyond this 20-kilometre threshold, the assessment reduces the perceived severity of impacts. Crucially, the communities living in these areas have not been subjected to any place-based assessment, meaning their specific circumstances and vulnerabilities remain unexamined. This omission undermines the credibility and completeness of the overall environmental impact evaluation.

In light of these concerns, it is clear that the applicant's approach compromises the integrity of the assessment. A more thorough and inclusive methodology is necessary to ensure that all significant effects, regardless of distance, are properly identified and addressed. Without such rigor, the environmental impact assessment cannot be considered fully reliable or fit for the purpose of informing planning decisions.

1.1.466 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The impact on local communities and the environment are always greater than anticipated

Finally, I would also ask the Scottish Ministers to consider: Eventual removal windmills when no longer viable and the blot on the landscape thereafter

1.1.467 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's documents reveal that these impacts have been materially underestimated. Crucially, the required heritage assessment

has not been undertaken. Furthermore, although the effects on the island communities affected by the development were identified, no assessment of these impacts has been conducted. In addition, the proposal has not satisfactorily demonstrated that it meets the necessary ecological criteria. It is also important to note that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these shortcomings, I respectfully urge that consent for the MachairWind Offshore Wind Farm be refused, alongside the associated marine licence. Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. Moreover, I advocate that the application should only be determined following a public inquiry, which would allow for a thorough examination of the issues raised in this objection. Regardless of the decision reached, I also request that the Scottish Ministers provide clear, reasoned conclusions addressing the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 147
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, comprising applications 00012385 and 00012386. These seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited (ScottishPower Renewables). I request that this submission be recorded as an official objection, that I be registered accordingly, and that I am informed of the final determinations made on these applications.

The development in question involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning around 448 square kilometres. This site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the southern Hebrides islands and their coastal communities.

The following exposition details the grounds for objection, rooted firmly in the statutory and policy context governing the determination of these applications. It is incumbent upon the applicant to substantiate, through robust and comprehensive evidence, that all relevant statutory tests and planning policies are met. The onus does not lie with objectors to disprove the application. In this instance, the applicant has failed to meet that evidential burden, and accordingly, consent should be withheld.

1.1.468 Legislative and Policy Framework

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. As the authorisation decision must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies is a fundamental procedural and substantive defect. This failure undermines the statutory basis for granting consent and renders the application legally deficient.

Specifically, the application does not adequately address compliance with General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively require a thorough and evidenced assessment of environmental, cultural, and social factors, as well as meaningful engagement and consideration of cumulative effects. The absence of such evidence and assessment constitutes a clear omission and conflict with the applicable legal and policy framework.

Given these deficiencies and the failure to demonstrate compliance with the statutory and policy requirements, the application cannot lawfully be granted consent. The

Marine (Scotland) Act 2010 and the National Marine Plan impose a mandatory obligation to refuse authorisation where compliance is not established. Therefore, on the grounds of non-compliance with the statutory framework and relevant National Marine Plan policies, this marine licence application should be refused.

The proposal under consideration fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which are directly engaged by this development. NPF4 is a significant material consideration that must be applied in conjunction with the relevant statutory duties and legislative requirements. The absence of demonstrated compliance with these policies, and the presence of identified deficiencies and omissions in the submitted evidence, weigh decisively against the granting of consent.

Policy 3 (Biodiversity) requires that developments protect and enhance biodiversity. The application fails to provide sufficient evidence that biodiversity will be maintained or improved. There is no clear demonstration that the proposal avoids harm to protected species or habitats, nor that any biodiversity net gain will be achieved. This omission is critical, given the statutory duties to conserve biodiversity under the Environment Act 2021 and related legislation.

Policy 4 (Natural Places) mandates the safeguarding of natural places and landscapes. The proposal does not adequately assess or mitigate its impact on the natural environment. The evidence lacks a comprehensive evaluation of effects on designated natural sites or landscape character, and no effective measures are proposed to prevent degradation. This failure conflicts with the policy's objective to maintain the integrity and quality of natural places.

Policy 7 (Historic Assets and Places) requires that developments conserve and enhance the historic environment. The application does not sufficiently address the potential impacts on designated or non-designated heritage assets. The absence of a thorough heritage impact assessment or appropriate mitigation measures contravenes the policy's requirements and statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Policy 11 (Energy) sets out criteria for energy developments, including the need to demonstrate compliance with environmental and social safeguards. The proposal does not provide adequate evidence that it meets these criteria. There is a lack of clarity on how the development aligns with energy policy objectives while respecting environmental constraints, resulting in a failure to satisfy Policy 11.

In summary, the proposal's failure to demonstrate compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4, combined with the identified deficiencies, omissions, and conflicts with the applicable legal and policy framework, constitutes a significant planning concern. These matters weigh against the granting of planning consent.

The proposal fails to comply with the mandatory requirements of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any

determination. This failure to provide an adequate environmental impact assessment undermines the statutory process and precludes informed decision-making.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations to assess effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance and the presence of deficiencies and omissions in the submitted evidence conflict with the legal and policy framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met by the application, as there is a clear absence of evidence showing that the specific needs and concerns of island communities have been adequately assessed or integrated into the planning rationale.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' interests are a material consideration. However, the submitted documentation does not provide any substantive analysis or engagement outcomes that reflect these interests. This omission constitutes a significant procedural and evidential deficiency. Without such consideration, the proposal conflicts with the applicable legal and policy framework, undermining the statutory purpose of the Act.

Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are evident, these matters must weigh decisively against the granting of consent. In this case, the failure to properly consider and weigh island community interests is a fundamental flaw that renders the proposal unacceptable in planning terms. The application should therefore be refused on the basis that it does not satisfy the statutory requirements imposed by the Islands (Scotland) Act 2018.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. The evidential burden rests squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this burden, leaving critical gaps in the evidence base that prevent a clear and confident determination that the proposal accords with the full spectrum of legal and policy obligations.

Moreover, where compliance has not been demonstrated, or where the submitted evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The absence of conclusive proof of compliance undermines the legitimacy of the application and precludes the necessary assurance that the proposal would not contravene statutory or policy safeguards. On this basis, the application should be refused.

1.1.469 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal's failure to meet the impact criteria set out in NPF4 Policy 11 is that it cannot receive the policy's intended support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon compliance with specific impact tests designed to protect communities, landscapes, seascapes, and other sensitive receptors. The proposal, however, does not satisfy these conditions, thereby undermining its eligibility for policy backing.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The safeguarding of island communities, a concern addressed under Policy 11(c), has also not been convincingly assured. These shortcomings collectively indicate a clear conflict with the policy's impact criteria.

Moreover, the ecological tests integral to Policy 11 have not been shown to be met based on the evidence submitted. This lack of assurance regarding ecological impact further weakens the proposal's alignment with the policy framework. In summary, the proposal's failure to satisfy these critical impact requirements means it cannot legitimately benefit from the support that NPF4 Policy 11 offers for renewable energy projects.

When assessing the proposal against the relevant policies within NPF4, it becomes apparent that the necessary mitigation measures to prevent significant adverse effects on designated assets have not been satisfactorily demonstrated. Policy 11 must be considered alongside Policy 4(c) and 4(d), which afford protection to National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on the qualities for which these areas are designated. In addition, Policies 7(h), 7(c), and 7(d) specifically safeguard scheduled monuments, their settings, and other historic assets. Policy 3 further requires the protection of biodiversity. The evidence submitted fails to show that the proposal's impacts can be effectively mitigated to a degree that would comply with these interconnected policies, particularly in relation to the preservation of landscape qualities, heritage asset significance, and ecological integrity.

Moreover, the proposal falls short in demonstrating that it would safeguard island communities and their unique cultural and environmental contexts, which are fundamental considerations under these policies. The significant adverse effects anticipated on nationally designated landscapes and seascapes are not adequately addressed, nor has the cultural significance of scheduled monuments and their settings been convincingly protected. The ecological assessments submitted do not meet the requisite tests to confirm that biodiversity interests would be maintained or enhanced. Taken together, these shortcomings establish a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, thereby undermining the proposal's compliance with the national planning framework.

In comparing the proposed development to the existing terrestrial planning framework, it is apparent that the mitigation measures fail to address the

fundamental conflicts identified with the Argyll and Bute Local Development Plan 2. The proposal would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This failure to adequately mitigate impacts on land-based assets distinguishes the proposal from acceptable developments that align with the objectives of the Local Development Plan.

Consequently, the proposal is inconsistent with the development plan as a whole, including National Planning Framework 4. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with the relevant policies or that the adverse effects can be appropriately managed. On this basis, the proposal conflicts with the terrestrial development plan framework and should be refused.

1.1.470 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant's own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. Furthermore, the applicant's documentation acknowledges the influence of distance on judgements; for example, an assessment of a coastal area over 30 kilometres away concludes that the scale of change is small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes lie results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the effects the Scottish Ministers are being asked to consider.

The visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the stated 35-year operational lifespan. This change would be a novel feature in an environment that has, until now, been characterised by natural darkness, thereby affecting the visual experience of the area during night-time hours.

It is also noted that the 35-year operational period does not represent a limit on the potential harm in policy terms. The decision to grant consent for this development would effectively amount to a determination that this particular seascape is suitable for wind farm use. Such a decision carries significant weight, as it establishes a precedent regarding the acceptability of lighting effects and their impact on the character of the night-time environment.

In balancing these considerations, it is important to recognise the lasting implications of introducing permanent lighting into an unlit seascape, alongside the policy recognition that consent equates to suitability for wind farm development in this location. Any assessment of the proposal must therefore carefully weigh the visual and character impacts against the broader policy framework governing offshore wind farm siting.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.471 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's recognised approach—developed and refined through consultation with that body—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline

occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

The applicant's assessment acknowledges the cultural significance of the heritage assets primarily through qualities such as pilgrimage, arrival by sea, movement within a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape. Notably, these attributes are experienced through dynamic movement rather than static viewpoints. While this recognition is a positive step towards understanding the heritage value, the assessment may not fully capture the experiential qualities that contribute to the broader cultural landscape.

Historic Environment Scotland, in their consultation responses included within the application, highlighted this potential shortcoming by requesting additional viewpoints. Their concern was that the current assessment might inadequately represent these wider qualities, which are essential to appreciating the heritage assets in their full context. This suggests a need for a more comprehensive approach that goes beyond fixed observation points to encompass the cultural narratives conveyed through movement and the relationships between elements in the landscape.

Given the importance of these experiential and relational qualities, it is essential that the assessment methodology and any proposed mitigation measures reflect this complexity. Without a thorough representation of the cultural landscape's dynamic nature, there is a risk that the heritage impacts may be underestimated. Therefore, further consideration should be given to incorporating these wider qualities to ensure that the cultural significance of the affected assets is fully and appropriately addressed.

The heritage impact conclusions presented rely heavily on the landscape assessment as their foundation. However, where the landscape effects have been understated, as identified previously, the subsequent heritage conclusions inevitably reflect that same understatement. This dependency calls into question the robustness of the heritage impact findings.

In essence, the credibility of the heritage assessment is compromised by the deficiencies in the landscape evaluation. Without an accurate and comprehensive appraisal of landscape effects, the heritage conclusions derived are not sufficiently reliable to inform decision-making. Therefore, the current heritage impact conclusions should be treated with caution given their reliance on a flawed landscape assessment.

The application as submitted fails to comply with essential policy requirements designed to protect heritage assets, thereby undermining its acceptability. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which addresses scheduled monuments, along with Policies 7(c) and 7(d) concerning the setting of heritage assets. These policies are complemented by GEN 6 and

paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a robust framework for safeguarding the cultural significance of heritage assets of international and national importance.

Despite this clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be protected. Critically, the Scottish Ministers have not been presented with the necessary assessment that such a conclusion would require. Without this assessment, there can be no assurance that the development will respect or preserve the heritage values enshrined in these policies.

In conclusion, the failure to meet these key policy obligations in relation to heritage protection renders the application unacceptable in its current form. It is therefore recommended that the application be refused on these grounds unless and until a comprehensive and satisfactory assessment is provided.

1.1.472 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

The applicant's failure to assess the habitability of the affected islands has practical consequences for understanding and mitigating impacts on island communities. Although their consultants acknowledged habitability as a potentially significant pathway of effect, no place-based assessment was conducted for these islands. Instead, the socio-economic assessment in Chapter 18 focuses on regional analysis and detailed examination of port communities, concluding—without specific evidence—that island communities are of low sensitivity to tourism effects. This approach overlooks the unique nature of small island economies, which are not average regional economies but are heavily reliant on sectors vulnerable to changes in visitor appeal. Consequently, dependence on increasing visitor numbers intensifies their sensitivity rather than diminishing it. Therefore, the conclusion of low sensitivity lacks empirical support and rests on an unsubstantiated assumption rather than robust place-based analysis.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore,

NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.473 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and decommissioning activities into this sensitive environment over several decades presents a substantial risk of significant adverse environmental effects.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

The legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The applicant's submission fails to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal an insufficient degree of certainty that the legal requirements can be met, thereby undermining the protections afforded to these ecological features. Given this clear shortfall, the application does not fulfil the necessary legal criteria, and consent should therefore be withheld.

1.1.474 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the current approach to assessing the proposed project, as only a portion of it is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot function—have been deferred to separate, later applications. This fragmentation means that the full scope of the project's impacts is not being evaluated in a single, comprehensive process.

The consequence of this piecemeal approach is that significant elements of the development will be subject to subsequent consenting processes that occur after the principal decision on the wind farm itself has been made. Such a method prevents the decision-makers from having a complete understanding of the cumulative effects of the entire proposal at the time they grant consent. This is particularly problematic because it obscures the true scale and nature of the project's environmental and operational impacts.

This approach is inconsistent with established legal principles, as affirmed in the Raeshaw Farms case, which emphasises that a project must be assessed as a whole rather than being artificially divided into smaller parts whose individual effects may seem less significant. To ensure a lawful and thorough evaluation, the entire development, including all essential infrastructure, must be considered together. Without this comprehensive assessment, the current process is fundamentally flawed and risks overlooking critical issues.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

While mitigation measures have been proposed, they fail to address a fundamental procedural deficiency concerning project splitting and the assessment of cumulative effects. The applicant has not satisfactorily demonstrated compliance with GEN 21 and paragraph 4.85 of the National Marine Plan, nor with NPF4 Policy 11(e), all of which explicitly require comprehensive evaluation of cumulative and in-combination effects. Furthermore, the requirements of the Environmental Impact Assessment Regulations in relation to project splitting have not been met. This omission means that the cumulative impacts of the proposal and the overall effects of the project, including any deferred works, have not been reliably identified or assessed. It is therefore essential that the decision-making process explicitly considers the treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.475 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, an uncertainty that fundamentally challenges the legitimacy of the applicant’s case. The applicant requests that Scottish Ministers place significant weight on this process, yet the quality of public engagement throughout both the plan and site-selection stages has been demonstrably deficient. These shortcomings have persisted into the application stage itself, which is extensive and complex, comprising many thousands of pages of technical material. Crucially, the consultation period has coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is severely limited. This situation contrasts sharply with the applicant’s position, having had years to prepare and substantial professional and financial resources at its disposal.

The National Marine Plan, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by decisions of this scale must be afforded a realistic opportunity to engage. Regrettably, the conditions under which affected communities have been expected to respond fall short of these established standards. This shortfall undermines the fairness and inclusiveness that are essential to legitimate decision-making processes. It is imperative that Scottish Ministers recognise this deficiency and take it fully into account when considering the representations made.

In light of these concerns, it is clear that the consultation process has not met the requisite standards for effective public participation. This failure has compromised the integrity of the site-selection process and, by extension, the application as a whole. Therefore, the weight afforded to the site-selection process should be

carefully re-evaluated, with full acknowledgement of the limitations imposed on affected communities throughout the consultation period.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.476 Effects on Local Area

The practical consequence of the applicant’s underassessment is that the direct and significant effects on the communities of Islay, Colonsay, and Oronsay have not been properly recognised or addressed. Despite Islay and Colonsay being the closest inhabited islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application evaluates Islay primarily as a potential project site rather than as a community affected by proximity. This omission fails to consider the Atlantic-facing communities on Islay whose daily environment and economy are intimately connected to the nearby 448 square kilometre development area, leaving a critical gap in understanding the local impacts on their setting, economy, and social fabric.

For Colonsay and Oronsay, the situation is equally concerning. Their seaward outlook, which fundamentally shapes everyday life, directly faces the proposed development. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan. This area represents the clearest recognition within the application that harm to the internationally protected seabird populations of these

cliffs cannot be ruled out, yet the assessment does not adequately address the wider implications for the community and environment dependent on this designated site.

Further compounding the deficiencies in the heritage assessment is the presence of Oronsay Priory, a scheduled monument of national importance within this community's area. The assessment's identified gaps, particularly in relation to the treatment of the monument's open maritime setting, apply fully here and undermine confidence in the evaluation's reliability. Taken together, these shortcomings demonstrate a failure to comprehensively assess the environmental and heritage impacts on Islay, Colonsay, and Oronsay, thereby weakening the overall credibility of the application's impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and significant effects are accepted for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

However, the evaluation of heritage impacts appears to underestimate the significance of Iona's monastic landscape, which includes internationally important sites such as the Abbey, the Nunnery, and the high crosses. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape in understanding this heritage. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, potentially overlooking key experiential impacts.

Community concerns further underline the scale of the effects, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a landmark 141 metres high visible from Iona at approximately 33 kilometres; the largest turbines would exceed this height by approximately 194 metres at a closer distance of roughly two-thirds of that range. Taken together, these points suggest that the visual, community, and heritage impacts on Iona may be both more extensive and more significant than the applicant's assessment indicates.

The applicant's assessment of visual and community impacts on Mull and Ross of Mull coastal areas notably underestimates the significance of effects despite recognising some high sensitivities. While mitigation measures are acknowledged, they rely heavily on distance-based reasoning that inadequately addresses the experiential and economic consequences for local communities. For instance, the Ross of Mull South coastal area is identified as having High sensitivity at 22 to 24 kilometres and is attributed only Medium magnitude impacts, yet significant effects are accepted at Erraid and on the Core Paths of the Ross. Fionnphort, a key

gateway to Iona and the primary embarkation point for visitors, is acknowledged to be significantly affected, yet no place-based assessment has been undertaken for this community most directly tied to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, despite being of High sensitivity throughout at distances of approximately 21 to 33 kilometres, is assigned no more than Medium magnitude impacts. This approach is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's conclusion of a small scale of change due solely to viewing distances over 30 kilometres illustrates a reliance on quantitative distance rather than qualitative experience. Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers—depends on the largely unindustrialised Atlantic seascape that the development would fundamentally alter, yet none of these vital communities has received a tailored, place-based impact assessment. This collective inadequacy in addressing the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent populations represents a fundamental shortcoming in the applicant's assessment.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery. The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area at a distance of approximately 35 kilometres, this conclusion

appears inconsistent when contrasted with the inherently sensitive nature of Tiree's landscape. The area is correctly identified as having High sensitivity, yet the scale of the proposed turbines—up to 335 metres in height—would introduce vertical elements unprecedented in the island's seascape. Given that Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, reaching only 141 metres, the dominance of sea and sky fundamentally defines its landscape character. The introduction of turbines more than twice this height would significantly alter the open oceanic horizon that is central to Tiree's distinctive sense of place. Consequently, a Low magnitude of change understates the true extent of visual and landscape impact on such an exposed and sensitive receptor. Therefore, the applicant's evaluation cannot be regarded as a reliable reflection of the likely effects on Tiree's landscape character.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development area. For instance, the community-owned island of Gigha, celebrated nationally for its regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula, yet these important seaward panoramas are subject only to the distance-based moderation critiqued here. Moreover, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura and surrounding waters, alongside the Treshnish Isles and nearby mainland coasts, share this unassessed vulnerability. Consequently, the applicant's approach compromises the comprehensiveness of the assessment by omitting these key receptors, undermining confidence in its conclusions.

There remains considerable uncertainty regarding the applicant's methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant's approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.477 Personal Observations

In addition to the planning matters above, I am personally concerned because: We live, work and sail here. It would be a tragedy for the entire community and economy of West Coast of Scotland. Millions of tourists come here by land, sea and air to enjoy this incredible area.

Based on my own local knowledge, I also wish to highlight that: The local environment, landscape, wildlife and community is a jewel in Scotlands crown. Don't rip it out.

Finally, I would also ask the Scottish Ministers to consider: Do not poison this land.

1.1.478 Further Comments

You're the custodian of this ancient landscape. Do your jobs.

1.1.479 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant’s documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 148
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the establishment of an offshore wind farm with an installed capacity of approximately 2 GW. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine space north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is adjacent to the islands and coastal communities of the southern Hebrides.

My objection is founded upon detailed planning and environmental considerations, evaluated within the statutory and policy frameworks governing these applications. It is important to emphasise that the onus lies firmly on the applicant to provide robust evidence demonstrating full compliance with all relevant tests and requirements. Objectors, such as myself, bear no obligation to establish contrary evidence. Upon careful review, it is clear that the applicant has failed to meet this evidentiary burden. Therefore, I contend that consent for these proposals must be refused.

I request that this letter be accepted as a formal objection, that I be recorded as an objector in the decision-making process, and that I receive notification of the final determination regarding these applications.

1.1.480 Legislative and Policy Framework

The marine licence application fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. This failure is material to the determination of the application and weighs decisively against the granting of consent. The application does not adequately address key General Policies including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies form an integral part of the statutory assessment framework, and the absence of demonstrated compliance constitutes a fundamental deficiency. Where evidence identifies omissions, conflicts, or uncertainties in relation to these policies, the statutory framework requires that such matters must weigh against authorisation. Accordingly, the application as submitted does not meet the legal and policy standards mandated by the Marine (Scotland) Act 2010 and the National Marine Plan, and consent should be refused on these grounds.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places),

Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence before the determining authority fails to demonstrate compliance with these policies.

The applicant's evidence does not adequately address the requirements of Policy 3 (Biodiversity). There is a lack of sufficient information to confirm that the proposal will protect or enhance biodiversity, as mandated by NPF4. Similarly, the application falls short of meeting Policy 4 (Natural Places), which requires the safeguarding and enhancement of natural environments. The absence of robust evidence confirming that natural places will be preserved or improved constitutes a clear deficiency.

Regarding Policy 7 (Historic Assets and Places), the proposal does not provide convincing evidence that historic assets and their settings will be conserved or enhanced. The failure to demonstrate compliance with this policy indicates a significant omission in the application's assessment of heritage impacts.

Finally, the proposal does not satisfy the requirements of Policy 11 (Energy). The applicant has not shown that the development aligns with the energy policies set out in NPF4, nor that it contributes to sustainable energy objectives as required.

Where compliance with these policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The proposal's failure to meet the fundamental requirements of NPF4 in relation to biodiversity, natural places, historic assets, and energy is a material consideration that must lead to refusal.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal be identified, thoroughly assessed, and transparently reported prior to any determination on consent. Furthermore, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests.

In this case, the evidence before the determining authority does not demonstrate compliance with these fundamental legal requirements. The environmental impact assessment provided fails to adequately identify and assess all likely significant environmental effects, as required by the 2017 Regulations. Similarly, the Habitats Regulations Assessment is incomplete and does not satisfy the statutory tests necessary to ensure that the proposal will not adversely affect the integrity of European protected sites.

These deficiencies and omissions represent a clear failure to meet the mandatory procedural and substantive standards established by the relevant legislation. The absence of a comprehensive and compliant environmental impact assessment and habitats regulations assessment undermines the decision-making process and conflicts directly with the applicable legal and policy framework.

Accordingly, given that compliance has not been demonstrated and significant evidential shortcomings persist, these matters must weigh decisively against the granting of consent for the proposal.

There is significant uncertainty as to whether the proposal has properly considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The Act explicitly requires that these interests be integral to the decision-making process. However, the submitted evidence fails to demonstrate compliance with this statutory requirement. Moreover, the absence of clear consideration constitutes a deficiency and omission in the application's assessment. Such failures directly conflict with the applicable legal and policy framework. In accordance with established principles, where compliance is not demonstrated and deficiencies exist, these factors must weigh against the granting of consent. Therefore, on the basis of the proposal's failure to meet the requirements of the Islands (Scotland) Act 2018, consent should be refused.

1.1.481 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet evidence indicates a clear pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This implicit distance-based moderation is corroborated by the applicant's own documents, which acknowledge that at viewing distances exceeding 30 kilometres, the scale of change is judged as small, and that High magnitude effects are confined to within about 20 kilometres, Medium effects between approximately 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the inputs to the protective assessments are systematically understated at precisely the distances where the most sensitive designated landscapes are located, undermining the reliability of the conclusions presented to the Scottish Ministers for their consent decision.

The visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an

approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the 35-year operational period. This change would be immediately perceptible and represent a significant departure from the existing natural darkness of the area.

Moreover, the 35-year operational lifespan does not mitigate the extent of harm under planning policy. Granting consent for this development effectively establishes that the seascape is deemed appropriate for wind farm use, setting a precedent that could influence future decisions and expectations regarding this environment.

Therefore, careful consideration must be given to the implications of altering the night-time seascape, not only in terms of immediate visual impact but also regarding the broader policy message such consent conveys about the suitability of this seascape for industrial development.

There remains significant uncertainty regarding the extent to which the proposal complies with the relevant planning policies designed to safeguard landscape and seascape interests. The effects identified engage several key provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively set a clear framework for the protection of nationally important natural assets, and any proposal must demonstrate consistency with their requirements.

However, the applicant has not satisfactorily demonstrated that its assessment of the scale of the accepted effects aligns with its own stated methodology. More importantly, there is an absence of clear evidence that the proposal meets the policy tests intended to preserve nationally significant landscapes and seascapes. In light of these shortcomings, the proposal does not convincingly comply with the statutory and policy safeguards in place, and as such, it should not be supported.

1.1.482 Cultural Landscape, Archaeology and Historic Environment

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The mitigation measures proposed rely heavily on the findings of the landscape assessment, which serves as a foundational element for evaluating heritage impacts. However, where the landscape effects have been understated, as previously detailed, this has a direct and compounding effect on the credibility of the heritage conclusions. The extent to which landscape changes influence heritage assets is therefore not fully acknowledged, leading to an overall mitigation strategy that may be insufficiently robust.

This interdependency reveals a critical weakness in the assessment framework. Because the heritage conclusions are derived from the landscape assessment, any underestimation of landscape effects inherently carries through to the heritage impact analysis. Consequently, the conclusions regarding heritage impacts cannot be considered fully reliable, calling into question the adequacy of the mitigation measures and the broader planning judgement based upon them.

1.1.483 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

1.1.484 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

While mitigation, compensation measures, and future monitoring are often proposed to address potential impacts on protected habitats, these alone do not satisfy the stringent legal requirements set out under the Habitats Regulations. Consent for

developments affecting such sites can only be lawfully granted where the competent authority is assured that the proposal will not adversely affect the integrity of the protected site, and no reasonable scientific doubt remains. This high evidential standard places the burden firmly on the applicant to demonstrate compliance, rather than relying solely on mitigation proposals. This framework is reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f), which collectively emphasize the necessity for robust scientific certainty before consent can be given. In light of these clear legal and policy imperatives, any development proposals must rigorously meet these standards to secure lawful consent.

1.1.485 Cumulative and In-Combination Effects

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

1.1.486 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

The practical consequence of the current Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make an informed decision on the application due to insufficient environmental information. The EIA is the principal evidential basis for determination, and the critical issue is not the extent of the assessment but its adequacy. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Furthermore, the application relies in certain instances on future assessments, post-consent plans, monitoring, and additional approvals to address environmental effects. However, these measures do not negate the requirement under the EIA Regulations that likely significant effects must be fully understood prior to determination. The regulatory framework clearly mandates that the environmental impacts should be adequately assessed and made available at the time of decision-making, rather than deferred to later stages of the process.

In conclusion, the Scottish Ministers are obliged to determine the application based on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted satisfies this requirement. Without sufficient and robust environmental data, any determination risks being made on an incomplete understanding of likely significant effects, which undermines the statutory purpose of the EIA and the integrity of the decision-making process.

1.1.487 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which border the development’s closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is the subject of the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to adequately address the significant and direct effects on these island communities and their heritage.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

In comparing the applicant's assessment with the actual impacts on Mull and the Ross of Mull, it becomes evident that the proposed mitigation measures do not adequately address the significant visual and community effects. While the applicant acknowledges significant effects at locations such as Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital point for visitor embarkation—these admissions highlight only a portion of the wider impacts experienced by these coastal communities. The assessment attributes a Medium magnitude of effect at distances of approximately 22 to 24 kilometres, yet the significance of these effects on local communities that depend on visitor flows is not sufficiently explored or mitigated.

Moreover, across Mull itself, the applicant concedes significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly identified as having High sensitivity at distances ranging from 21 to 33 kilometres. However, the applicant's assignment of no more than Medium magnitude to this area appears inconsistent with the landscape's designation and its importance to local tourism and wildlife. This underestimation of magnitude undermines the assessment's reliability and raises concerns about the adequacy of proposed mitigation in preserving the scenic and community values of these designated landscapes.

Finally, the applicant's reliance on distance-based reasoning, as demonstrated in the treatment of the Wilderness and Gribun Rocks coastal area, where changes at over 30 kilometres are judged to be small, fails to fully appreciate the character and economic dependence of Mull's west-facing communities. These communities, including wildlife boat operators and accommodation providers, rely heavily on the integrity of the Atlantic seascape, which the development risks industrialising. Notably, none of these communities has been subject to a detailed, place-based assessment, leaving a significant gap in understanding and addressing the potential adverse effects. This omission calls into question the robustness of the applicant's evaluation and the sufficiency of mitigation measures proposed for the area's distinctive coastal environment and its tourism-dependent economy.

The applicant's assessment acknowledges the potential effects of the proposed development on designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area and several National Scenic Areas (NSAs) at varying distances. Specifically, Ulva, situated within the Loch na Keal NSA, is noted as sharing the same effects on the designated landscape. Ulva is a community-owned island undergoing a process of regeneration, characterised by a small, re-establishing population whose recovery is intimately linked to the qualities of its setting and the unspoilt seascape that would be affected by the development. Notably, the applicant's assessment does not include any evaluation of impacts on this vulnerable island community, thereby omitting consideration of the potential consequences for its natural and cultural qualities. Similarly, Staffa, another island within the same NSA and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometre threshold recommended by NatureScot for assessing effects on NSA qualities. Despite the applicant accepting the panoramic maritime qualities of Staffa, the conclusion reached is that the scale of change there would be small and the effect not significant.

Further afield, the applicant assesses the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, as having high sensitivity but assigns only a medium to low magnitude of impact. This moderation is explained by factors such as distance, apparent scale, and retention of landforms, even though the NSA's designation is fundamentally based on the wild, undeveloped character of its Atlantic outlook, which could be compromised. The Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of roughly 35 to 40 kilometres, is treated in a similar manner within the assessment. Taken together, these approaches suggest an underestimation or omission of significant effects on

important designated landscapes and vulnerable island communities. Such limitations in the applicant's assessment risk undermining the protection of the intrinsic natural and cultural qualities that these landscapes and communities possess, which warrants more comprehensive and careful consideration in the planning evaluation.

The practical consequence of the applicant's assessment is a significant understatement of the visual and landscape effects on Tiree, which risks resulting in an unreliable evaluation of the project's true impact. The South Tiree coastal area, located approximately 35 kilometres from the proposed development, is identified as having High sensitivity; however, the assessment attributes only a Low magnitude of change to this receptor. This low magnitude classification does not adequately reflect the extent to which the development would alter the existing landscape character, particularly given Tiree's exceptional sensitivity.

Tiree's landscape is defined by its exceptionally low-lying nature, with the highest point, Ben Hynish, rising merely 141 metres above sea level. The island's distinctive character arises from the dominance of sea and sky and its open oceanic horizon. Introducing turbines up to 335 metres in height would place vertical structures into the seascape that have no precedent on the island. This scale of change is fundamentally at odds with the assessment's Low magnitude conclusion and exemplifies the understatement of effects that this representation seeks to highlight. Consequently, the evaluation does not reliably capture the scale of impact on a receptor as sensitive and distinctive as Tiree.

The applicant's assessment has not addressed the potential effects on several mainland and island communities that have direct views of the proposed development and depend economically on the seascape. Notably, Gigha, a community-owned island and a national symbol of island regeneration, faces the development area from the east. The impact on this finely balanced community and its economy remains unexplored. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors to the entire peninsula. These seaward panoramas represent receptors of high sensitivity, yet the assessment applies distance-based moderation that diminishes the significance of such views without adequate justification. Furthermore, the west coast of Kintyre comprises a series of communities whose character and visitor economy are intrinsically linked to the open Atlantic seaboard looking towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts that share views of the development area are similarly omitted from a thorough evaluation. Given the omission of these key receptors, the assessment lacks comprehensiveness in addressing the full range of potential effects on communities with direct visual and economic ties to the seascape.

The applicant's assessment consistently moderates and discounts the magnitude of change for highly sensitive receptors located beyond approximately 20 kilometres. This systematic approach results in a failure to provide any place-based assessment for the communities living with those effects. Such an omission significantly undermines the integrity of the environmental impact assessment by underestimating the true extent and significance of impacts on these distant yet sensitive receptors.

In conclusion, the applicant’s distance-based methodology is demonstrably inadequate in capturing and addressing the full range of environmental effects beyond the 20-kilometre threshold.

1.1.488 Personal Observations

In addition to the planning matters above, I am personally concerned because: Will affect the livelihood of fisherman and small businesses involving the sea

Based on my own local knowledge, I also wish to highlight that: Will directly affect local marine life, and any small business based on sightseeing

1.1.489 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own assessment acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, published evaluations of the applicant’s documentation reveal that the extent of these impacts has been underestimated and that a comprehensive heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently submitted to the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. I also propose that the determination of the applications be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask the Ministers to provide clear and explicit conclusions concerning the impacts on cultural heritage and on the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 149
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this communication be recognised as an official objection, that I am recorded as an objector, and that I receive notification of the outcomes of these applications.

The development under consideration involves the construction of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project would encompass between 91 and 144 turbines, each potentially reaching a maximum height of 335 metres to blade tip. The proposed site lies within a Windfarm Development Area spanning roughly 448 square kilometres of marine environment, positioned to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona. This locale is in close proximity to the islands and coastal settlements of the southern Hebrides.

This objection is grounded in a detailed assessment of the planning and environmental considerations relevant to the proposal, firmly situated within the statutory and policy context that governs the determination of such applications. It is paramount to emphasise that the responsibility lies squarely with the applicant to provide adequate and convincing evidence that all applicable statutory tests and policy requirements have been met. Objectors are not obliged to establish the contrary. Having evaluated the evidence presented, it is evident that the applicant has failed to meet this burden of proof. Consequently, for the reasons elaborated herein, consent for the MachairWind Offshore Wind Farm should be refused.

1.1.490 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these requirements have been sufficiently addressed or fulfilled.

In addition, the Scottish Ministers, as the determining authority, are themselves required to have regard to these same statutory duties when considering the application. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the evidence provided, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for the proposal. Accordingly, the application should be refused on the basis that it does not meet the statutory obligations mandated by Schedule 9 of the Electricity Act 1989.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies of Scotland's National Marine Plan, thereby warranting refusal. The application does not provide sufficient evidence to satisfy the General Policies critical to the statutory assessment, including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The application's failure to demonstrate compliance with these policies constitutes a fundamental deficiency. The statutory framework mandates that authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. Here, no such relevant considerations have been identified to override the clear policy requirements. The absence of adequate evidence addressing co-existence with existing marine users, protection of the historic environment, safeguarding of landscape and national scenic areas, and conservation of natural heritage is a direct conflict with the Plan's General Policies. Furthermore, the application lacks sufficient engagement evidence and does not provide sound evidence to support its claims, undermining the robustness of the assessment. The cumulative impacts of the proposal have not been properly evaluated or mitigated, contrary to GEN 21 and paragraph 4.85.

Given these omissions and conflicts, the application does not meet the statutory test for granting consent under the Marine (Scotland) Act 2010. The identified deficiencies and failures weigh decisively against authorisation. Therefore, the marine licence application should be refused on the grounds of non-compliance with the National Marine Plan and the statutory requirements of the Marine (Scotland) Act 2010.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence provided fails to demonstrate compliance with these policies. There are clear deficiencies and omissions in the applicant's assessment and supporting documentation that result in conflicts with the applicable legal and policy framework. Given that compliance with these critical policies has not been established, and the evidence identifies substantive shortcomings, these factors weigh decisively against the granting of consent for the proposal.

The applicant's submission acknowledges that under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests.

However, the evidence before the determining authority reveals that compliance with these legal requirements has not been demonstrated. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted. The failure to adequately identify and assess the significant environmental effects, as well as the absence of a thorough habitats regulations assessment, constitutes a breach of the statutory framework governing such proposals.

Given these unresolved deficiencies and the lack of compliance with the mandatory legal and policy requirements, the proposal fails to meet the necessary environmental safeguards. Consequently, these shortcomings weigh decisively against the granting of consent.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unequivocal, as set out in the Act itself and reiterated in the supporting evidence (S01). The proposal documentation fails to provide adequate analysis or evidence that the specific needs, circumstances, and potential impacts on island communities have been properly identified, assessed, or integrated into the planning decision framework.

Furthermore, the absence of demonstrated compliance with the Islands (Scotland) Act 2018 constitutes a significant procedural and substantive deficiency. As established in the evidence (S01), where compliance has not been shown, or where there are identifiable omissions or conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. Given the critical nature of this statutory requirement and the failure of the applicant to address it satisfactorily, the proposal should be refused on the grounds that it does not meet the legal tests imposed by the Islands (Scotland) Act 2018.

There remains significant uncertainty as the applicant has failed to demonstrate compliance with all relevant legal and policy requirements. The responsibility lies squarely with the applicant to provide robust, objective, and proportionate evidence confirming that every statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. This burden has not been met. The submitted evidence reveals deficiencies and omissions that conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of planning consent in this case.

1.1.491 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to meet the impact criteria established in NPF4 Policy 11, which explicitly governs renewable energy development through its detailed provisions. Notably, the policy's clauses 11(c), 11(d), and 11(e) require careful consideration of impacts on communities, landscapes, seascapes, and other receptors. This application does not satisfy these requirements, thereby undermining the policy's intended balance between support for renewable energy and protection of environmental and cultural assets.

Specifically, the development would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the policy's safeguards. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the necessary ecological assessments and tests have not been convincingly addressed in the submitted evidence. Taken together, these deficiencies confirm that the proposal conflicts with the impact criteria of NPF4 Policy 11 and cannot be supported.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

The applicant's evidence clearly indicates that the proposal conflicts with the terrestrial development plan framework relevant to land-based effects, including the Argyll and Bute Local Development Plan 2. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that the policies within this plan are designed to protect. These conflicts are directly attributable to the nature and location of the development, which the plan seeks to safeguard through its provisions.

Furthermore, the proposal is not only at odds with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be reconciled or mitigated. Consequently, the proposal remains inconsistent with the established development plan framework, underscoring its unsuitability in the current form.

1.1.492 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to establish a clear distance threshold beyond which major effects cease, yet empirical analysis reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This finding emerges from a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3,

underscoring a systematic limitation in the evaluation approach that directly influences the classification of potential impacts.

Further examination of the applicant's documentation corroborates the significant role that distance plays in these judgements. For example, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. Similarly, the Landscape Character synthesis delineates a gradation of impact magnitude, with High magnitude effects confined to within approximately 20 kilometres, Medium effects occurring between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes lie results in protective tests being applied to understated inputs. Consequently, the conclusions drawn from the assessment do not reliably represent the true effects that Scottish Ministers are being asked to consent to.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot's visualisation guidance, which is a recognised standard, these materials inherently lack the capacity to fully convey the true scale and effect of the development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by

establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The proposal's failure to adequately assess and mitigate its environmental impacts results in a clear breach of key planning policies designed to safeguard important landscape and seascape interests. This non-compliance threatens the integrity of nationally significant natural assets, undermining the practical objective of preserving these environments for current and future generations. Without a robust demonstration of policy adherence, the potential for irreversible harm remains unacceptably high.

The applicant's submission notably lacks consistency between the scale of acknowledged effects and the methodology applied to reach those conclusions. This inconsistency calls into question the reliability of the environmental assessment and weakens confidence in the proposal's capacity to address adverse impacts effectively. Consequently, the assessment falls short of the standards set by NPF4 Policies 4(c), 4(d), 11(d), 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan, which collectively establish clear expectations for protecting nationally important landscapes and seascapes.

Given these deficiencies, the proposal cannot be considered compliant with the relevant planning policies. In the absence of demonstrable adherence to these statutory requirements, the development should not be approved. Safeguarding the nation's valued environmental assets must remain paramount, and any proposal failing to meet this threshold risks causing unacceptable and potentially irreversible harm.

1.1.493 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting

integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

The mitigation measures proposed rely heavily on the findings of the landscape assessment, which serves as a foundational element for evaluating heritage impacts. However, where the landscape effects have been understated, as previously detailed, this has a direct and compounding effect on the credibility of the heritage conclusions. The extent to which landscape changes influence heritage assets is therefore not fully acknowledged, leading to an overall mitigation strategy that may be insufficiently robust.

This interdependency reveals a critical weakness in the assessment framework. Because the heritage conclusions are derived from the landscape assessment, any underestimation of landscape effects inherently carries through to the heritage impact analysis. Consequently, the conclusions regarding heritage impacts cannot be considered fully reliable, calling into question the adequacy of the mitigation measures and the broader planning judgement based upon them.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential

evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.494 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal's impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

The proposal fails to meet essential planning and statutory requirements for the assessment and protection of island communities, resulting in a significant risk that their interests will be inadequately considered and potentially harmed. Without a robust and comprehensive evaluation of socio-economic impacts on these communities, the decision-making process lacks a sound evidential basis, undermining the precautionary principles mandated where evidence is insufficient. This failure directly conflicts with the practical necessity of safeguarding the sustainability and wellbeing of island populations.

The applicant explicitly acknowledged that island communities warrant particular scrutiny; however, it did not undertake the necessary assessments to fully understand or mitigate the potential effects of the proposal on these communities. Consequently, it has not demonstrated that the development is compatible with the maintenance of sustainable island communities. This omission represents a serious shortfall in addressing the requirements set out in the National Marine Plan, specifically GEN 19 and paragraph 4.81, as well as the relevant provisions of NPF4 Policy 11(c).

Moreover, the statutory duties enshrined in the Islands (Scotland) Act 2018 have not been fulfilled, as there is no evidence of meaningful engagement with island communities from the inception of the proposal through to its conclusion. This lack of engagement and failure to weigh their interests appropriately is contrary to established legal and policy frameworks designed to ensure that island communities are not disproportionately impacted by development proposals. On this basis, the proposal cannot be considered compliant with the necessary planning and statutory standards and should therefore be refused.

1.1.495 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ecological implications of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the development area itself. The surrounding waters are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and decommissioning activities into this environment over several decades raises significant concerns about potential adverse environmental effects. Consequently, the ecological importance and sensitivity of the site and its environs must be carefully considered to ensure that the proposal does not result in unacceptable harm to these protected marine features and species.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared where it cannot be confidently ruled out that the proposed development would adversely affect the integrity of the protected site. Their inclusion in the application signals an acknowledgment by the applicant of potential environmental impacts that require careful consideration.

Such submissions indicate that, according to the applicant’s own assessment, there remains a possibility that the Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site’s integrity. This reflects a precautionary approach, recognising the significance of the designated area and the need for appropriate measures should impacts be confirmed. The derogation and compensation documents are therefore intended to provide a framework for mitigating any identified harm to the guillemot population.

While the submission of these documents demonstrates the applicant’s awareness of potential issues and willingness to propose solutions, it also highlights an area of uncertainty within the assessment. The effectiveness of the compensation plan and

the acceptability of derogation measures will ultimately require thorough scrutiny. It is essential that any determination on adverse effects and the adequacy of proposed mitigation is made with full regard to the protected status of the site and the conservation objectives set out in relevant policy.

The applicant correctly acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, except where the stringent derogation tests are satisfied. It is essential to recognise that consent can lawfully be granted only when there is no reasonable scientific doubt concerning the absence of adverse effects. Furthermore, the burden of demonstrating this rests squarely with the applicant, and measures such as mitigation, compensation proposals, and future monitoring, while potentially beneficial, do not in themselves suffice to prove that the statutory tests have been met.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively impose a high evidential standard to safeguard protected habitats and species, ensuring that development proposals must be supported by robust and conclusive scientific evidence before consent can be granted. The integration of these policies with the Habitats Regulations underlines the comprehensive and precautionary approach required in decision-making.

Given this context, it is imperative that any development proposal subject to these requirements must provide unequivocal scientific evidence demonstrating no adverse effect on the protected site's integrity. Reliance on mitigation or monitoring alone is insufficient to meet the legal and policy standards. Therefore, decision-makers should maintain rigorous scrutiny of the evidence presented, ensuring compliance with both the statutory tests and the accompanying planning policies before granting consent.

The applicant has not demonstrated that the statutory tests required to protect internationally important habitats and species can be satisfied. This conclusion is drawn from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance. Without clear assurance that these legal protections are upheld, the application fails to meet the necessary statutory criteria, thereby undermining the justification for granting consent.

1.1.496 Cumulative and In-Combination Effects

There is significant uncertainty regarding the reliability of the cumulative impact assessment, as it is dependent on baseline evaluations that appear to understate key effects. Specifically, the landscape, heritage, and socio-economic assessments, which form the foundation of the Environmental Impact Assessment, have been demonstrated to present reduced baselines. Consequently, the cumulative assessment, which builds upon these initial findings, inevitably understates the combined effects of the proposed development alongside existing, consented, and

foreseeable projects. This foundational flaw calls into question the accuracy of the overall cumulative impact conclusions.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project's total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.497 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty surrounding the adequacy of the public participation process in relation to the site-selection exercise. Given that the applicant requests Scottish Ministers to place considerable weight on this process, the quality of public engagement is a matter of direct relevance. However, deficiencies identified at both the plan and site-selection stages have persisted through to the application phase. Notably, the application itself comprises an extensive volume of technical documentation, amounting to many thousands of pages.

Compounding this complexity, the consultation period has coincided with the busiest months for island communities, during which residents are engaged continuously throughout the visitor season. This timing has limited the availability of specialist advice and placed considerable strain on those affected, while the applicant has had the advantage of years of preparation supported by substantial professional and financial resources. Such an imbalance raises questions about the fairness and accessibility of the consultation process.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must have a genuine and realistic opportunity to engage in decisions of this scale. Unfortunately, the conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers give careful consideration to these shortcomings when evaluating the representations submitted.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient evidence to make an informed decision on the application. The assessment does not adequately address all pathways to significant effects, relying instead on incomplete investigations and

methodologies that fail to support its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern not substantiated by its own methodology; the heritage assessment does not apply its stated integrity test; and the socio-economic assessment neglects a place-based analysis of the affected islands.

Moreover, the application depends in part on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding environmental concerns. However, this reliance does not comply with the requirements of the EIA Regulations, which mandate that likely significant effects must be thoroughly understood prior to determination. The deferral of critical information compromises the regulatory process and undermines the assurance that potential environmental impacts have been fully considered at the decision-making stage.

It follows that the Scottish Ministers are bound to determine the application based solely on the evidence currently before them, without presuming that unresolved matters will be satisfactorily addressed later. Given the inadequacies in the environmental information submitted, the applicant has not demonstrated that the EIA is sufficient to meet this standard. Consequently, the application should not be approved in its present form.

1.1.498 Effects on Local Area

The applicant’s assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay’s North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay’s setting, economy, or community life. Similarly, Colonsay and Oronsay’s seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant’s evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

The applicant’s Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of the horizon. This finding is consistent with the high sensitivity attributed to the west

coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

When considering the applicant's assessment in relation to the effects on Mull and the Ross of Mull coastal communities and landscapes, it is important first to compare the proposed mitigation measures against the scale and nature of the impacts identified. The assessment acknowledges significant effects at key locations such as Erraid and along the Core Paths of the Ross of Mull South coastal area, which is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors, is accepted by the applicant as experiencing significant effects. This community is intrinsically connected to the visitor flows, underscoring the potential for substantial socio-economic consequences.

Extending across Mull, the applicant also accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is consistently assessed as having High sensitivity at viewing distances ranging from approximately 21 to 33 kilometres. However, the applicant attributes no more than a

Medium magnitude to the impacts here, which may understate the true significance given the area's national scenic importance.

The approach taken towards the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Despite the acknowledged viewing distance of over 30 kilometres, the applicant judges the scale of change to be small, relying primarily on distance-based reasoning. This method, as outlined in the applicant's own terms, risks overlooking the qualitative aspects of visual and experiential impact that extend beyond mere separation distance.

Crucially, the west-facing tourism economy of Mull, including its wildlife boat operations and the accommodation sectors in its western townships, is deeply dependent on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet none of these communities has been afforded a detailed, place-based assessment within the applicant's documentation. This omission limits the understanding of the potential adverse effects on communities whose livelihoods are closely tied to the natural environment and visitor experience.

In conclusion, while the applicant recognises some significant effects, the reliance on distance as a primary determinant and the attribution of only Medium magnitude in areas of acknowledged High sensitivity suggest that the assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull. The lack of detailed, place-specific evaluation for key tourism-dependent communities further compounds this shortfall. Therefore, the assessment as presented inadequately addresses the significant effects on these sensitive coastal landscapes and their associated communities.

The applicant's assessment notably underestimates the practical consequences for important designated landscapes and vulnerable island communities, risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a prime example. This small, re-establishing community depends critically on the unspoilt seascape and setting that are at risk; yet, no assessment has been undertaken to consider how the development might affect its ongoing regeneration.

Similarly, the applicant's evaluation of Staffa, located approximately 35 kilometres from the development site and also within the Loch na Keal National Scenic Area, is inadequate. Despite NatureScot's guidance to assess effects up to 30 kilometres, the applicant dismisses the significance of impacts beyond this range, concluding only a small scale of change and non-significant effect at Staffa. This is inconsistent with their own recognition of the island's panoramic maritime qualities and fails to fully acknowledge the potential extent of visual and experiential impacts on one of Europe's most celebrated small islands.

The assessment of the Jura National Scenic Area and the Scarba, Lunga and the Garvellachs National Scenic Area similarly downplays potential impacts by attributing Medium to Low magnitudes of effect based mainly on distance and retained landforms. However, these designations rest on the wild, undeveloped character of their Atlantic outlooks, which may be compromised by changes in seascape character even at distances of 28 to 40 kilometres. Together, these omissions and

underestimations weaken the protection afforded to these landscapes and island communities, which rely on the preservation of their distinctive natural and cultural environments.

The applicant's assessment of the South Tiree coastal area identifies this location as having a High sensitivity at a distance of approximately 35 kilometres, yet attributes a Low magnitude of change to the proposed development. This characterisation appears to significantly understate the true impact, given the sensitivity rating assigned. The designation of High sensitivity underscores the importance of the receptor landscape and suggests that any change, particularly of a visually intrusive nature, would be more pronounced and consequential.

Tiree's landscape is exceptionally low-lying and defined predominantly by its expansive sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The island's distinctive character rests on its open oceanic horizon, which has remained free from vertical structures of any significant scale. The introduction of turbines reaching heights of up to 335 metres would thus represent an unprecedented vertical intrusion into this seascape. Given this context, the conclusion that the magnitude of change would be Low does not appear to reflect the reality of the receptor's exposure or sensitivity. Consequently, the applicant's evaluation underestimates the scale of visual and landscape effects on Tiree, leading to an unreliable assessment that fails to fully acknowledge the distinctive and sensitive nature of this island setting.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape, undermining the comprehensiveness of the evaluation. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development waters directly from the east; yet, no examination has been made of the impacts on its delicate community balance and local economy. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors affected by the distance-based mitigation measures challenged in this objection, have been overlooked. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are shaped by the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands with sightlines to the development area are equally disregarded. This collective omission calls into question the thoroughness of the applicant's assessment regarding the full range of receptors reliant on and influenced by this seascape.

The applicant's approach to environmental impact assessment employs a distance-based methodology that systematically moderates and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This method contrasts with a more thorough, place-based assessment that would address the specific conditions and vulnerabilities of each affected community. By applying a generalized mitigation threshold at this distance, the assessment effectively diminishes the acknowledged magnitude of change experienced by

receptors further afield, potentially overlooking meaningful impacts that warrant detailed consideration and tailored mitigation measures.

Taken together, the evidence demonstrates a consistent pattern whereby highly sensitive receptors beyond the 20-kilometre limit receive only a moderated evaluation of effects, while the communities living within these areas are not the subject of any focused, locality-specific assessment. This systematic discounting undermines the integrity of the environmental impact assessment by failing to account adequately for the lived experience and environmental sensitivities of these distant but nonetheless affected populations. Such an approach risks underestimating significant adverse effects and weakens the overall robustness and credibility of the applicant's environmental evaluation.

1.1.499 Personal Observations

In addition to the planning matters above, I am personally concerned because: My family came from Mull and I have annually visited Mull ,Tiree and Iona for many years with children and extended family.We often take boat trips to the Treshnish Isles as well.
The beauty draws us back year after year as it does for many people.Many find Iona especially a special spiritual journey.
To put a windfarm here is to totally ignore the location and its unspoilt remoteness.It also ignores the effect onmarine and bird life.
The damage cannot be undone once this is built and in my opinion would be destructive .

Based on my own local knowledge, I also wish to highlight that: Seascapes,marine life,migtatory birds and the human need for unspoilt beauty

1.1.500 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, independent scrutiny of the submitted documentation reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, while the proposal identifies effects on the island communities concerned, it does not provide any substantive evaluation or assessment of these impacts. The ecological criteria required by law have also not been demonstrated as achievable. Additionally, the submission is incomplete in that only a portion of the project has been presented for ministerial consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider an alternative course, I request that they require the provision of further environmental information alongside improved visual representations of the project. Moreover, any determination should be deferred until a public inquiry has been held, allowing for a thorough examination of the concerns raised in this objection. Regardless of the final decision, I also ask that

the Ministers explicitly address and state their conclusions on the effects the development would have on cultural heritage and the impacted island communities within their reasoning.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 150
Dear Sir/Madam,

I hereby lodge a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be duly recorded, that I be registered as an objector, and that I receive notification of the final decision regarding these applications.

The proposal concerns the construction of an offshore wind farm with a generating capacity in the region of 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This facility would occupy a Windfarm Development Area extending over approximately 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines my objections grounded in planning and environmental considerations, assessed against the pertinent statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to furnish sufficient evidence demonstrating compliance with the applicable tests. Objectors carry no obligation to prove the contrary. Upon careful evaluation of the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, the applications should be refused consent.

1.1.501 Seascape, Landscape and Visual Effects

The assessment methodology employed by the applicant exhibits a significant limitation in its treatment of distance thresholds, which undermines the reliability of the predicted effects. Notably, the applicant’s written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nevertheless, a published Evidence Note, which draws exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility.

Further examination of the applicant’s own documents confirms the critical role distance plays in shaping these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the site concludes that, owing to the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented fail to provide a reliable description of the effects that the Scottish Ministers are being asked to consider for consent.

The visual materials submitted in support of the assessment inherently limit the ability to accurately convey the scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly acknowledges that printed visualisations cannot fully replicate the scale a viewer perceives in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent means of correcting or enhancing perceptual accuracy. Consequently, reliance on these visual materials may result in an underestimation of the true visual effects, and their limitations should be given due consideration when assessing the overall impact.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant's assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework's objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.502 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a significant uncertainty regarding the true impact of the proposals on the setting of historic assets. Although the applicant states that they have applied Historic Environment Scotland's recognised methodology, the essential evaluative process required to determine whether the integrity of setting is maintained has not been demonstrated. Without this key step, the conclusions drawn about heritage impacts lack the necessary evidential foundation and cannot be relied upon with confidence.

Historic Environment Scotland's methodology, developed through extensive consultation, explicitly requires an assessment that goes beyond mere description of visual changes. It mandates a focused evaluation of how any changes affect the contribution that setting makes to the cultural significance of the heritage assets, with particular attention to whether the integrity of that setting is adequately retained. The methodology also clarifies that visual change alone should not be equated directly with adverse impact, emphasising the need for a nuanced and reasoned judgement.

However, a detailed Methodological Audit, which reviewed the applicant's own Appendix 14.3, found that the assessment primarily describes factors such as visibility, distance, and screening, before making an unsubstantiated conclusion that the integrity of setting remains intact. This audit highlights that the crucial evaluative step prescribed by the methodology is absent from the applicant's assessment and its worked examples. Consequently, the reliability of the assessment's conclusions is fundamentally undermined, and the heritage impacts remain insufficiently justified.

The practical consequence of relying on a limited assessment of heritage impacts is that the full cultural significance of the affected assets may be overlooked, leading to an incomplete understanding of potential harm. The applicant's baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These aspects emphasize the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced sequentially rather than from static viewpoints.

However, the applicant's assessment appears insufficient to capture these experiential qualities fully. Historic Environment Scotland, whose consultation responses are included in the application, highlighted this shortcoming by requesting additional viewpoints. Their intention was to ensure that the broader cultural landscape and the intangible connections between heritage assets would be adequately represented and assessed.

In light of these concerns, it is essential that the assessment process incorporates a comprehensive evaluation of the heritage assets' cultural significance, reflecting their dynamic and interconnected nature. Without such an approach, the appraisal risks undervaluing the heritage impacts, potentially undermining the effectiveness of any proposed mitigation measures.

The applicant's evidence acknowledges that the heritage conclusions presented in the proposal are fundamentally reliant upon the findings of the accompanying landscape assessment. It is expressly noted that where the landscape effects have been understated, as detailed previously, the resulting heritage impact conclusions inevitably reflect and perpetuate this understatement. This interdependence between the landscape and heritage assessments is critical because any deficiencies or minimisations within the landscape evaluation directly compromise the reliability of the heritage conclusions. Consequently, the extent of harm or impact to heritage assets may be significantly greater than suggested if the landscape effects have not been fully or accurately appraised. In light of this, the credibility of the heritage impact assessment is undermined, and caution should be exercised in accepting these conclusions without further independent verification.

The application fails to comply with essential policy requirements safeguarding heritage assets, rendering it unacceptable. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) related to the setting of heritage sites, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets, nor their settings, will be protected. Crucially, the Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. In the absence of this evidence, the application cannot be considered to meet the requisite standards for heritage protection.

1.1.503 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, whose presence underpins the local economy and social fabric. These visitors are attracted specifically by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic foundations of these communities. This, in turn, would jeopardise the provision of essential services, threaten population stability and ultimately compromise the long-term viability of the island settlements.

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small

island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

The proposal fails to demonstrate compliance with key policy and statutory requirements designed to protect island communities, as set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be assessed thoroughly and given appropriate weight through meaningful engagement from the earliest stages to the conclusion of the decision-making process. Despite recognising the necessity for particular scrutiny of island communities, the applicant has not undertaken the comprehensive assessment needed to understand the proposal's effects on these communities. Consequently, it has not demonstrated compatibility with sustainable island communities, nor has it satisfied the statutory duties owed to them. Given these significant shortcomings, the proposal cannot be considered acceptable in terms of its impact on island communities.

1.1.504 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support notable populations of seabirds, marine mammals, and basking sharks. The proposed project would bring construction, operational, and decommissioning activities on a very large scale, extending over several decades, thereby introducing sustained pressures on these ecologically sensitive environments.

Given the recognised ecological importance and sensitivity of the site and its adjacent marine habitats, the potential for significant adverse environmental effects from the development is substantial. The presence of protected species and priority features necessitates careful consideration of the impacts that such large-scale and long-term activities may impose on biodiversity and habitat integrity.

Consent for developments affecting protected habitats and species can only be granted where it is conclusively demonstrated that there will be no adverse effect on the integrity of the protected site, unless the strict derogation tests under the Habitats Regulations are satisfied. The competent authority must be certain that no reasonable scientific doubt remains regarding the proposal's impacts. This high evidential standard places the burden of proof firmly on the applicant. Importantly, mitigation measures, compensation proposals, and future monitoring arrangements alone do not suffice to meet the statutory requirements. This legal framework is reinforced by the Habitats Regulations and is further engaged through relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f). In summary, planning consent in these

circumstances demands robust, unequivocal evidence that statutory tests are fully satisfied before permission may lawfully be granted.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.505 Cumulative and In-Combination Effects

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

1.1.506 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that

Ministers bear these factors firmly in mind when considering the representations made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

The Environmental Impact Assessment submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. While the assessment covers various topics, it fails to investigate identified pathways to significant effects comprehensively. For example, the landscape assessment's conclusions are based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply the integrity test it claims to use, and the socio-economic assessment lacks any place-based analysis relevant to the affected islands. Furthermore, the application inappropriately relies on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the requirement under the EIA Regulations that likely significant effects be understood before determination. It is therefore clear that the applicant has not demonstrated that the environmental information provided is adequate for the Scottish Ministers to discharge their duty properly at this stage.

1.1.507 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands and their communities. Despite this geographical closeness, the applicant's assessment predominantly frames Islay solely as a potential project location, neglecting to evaluate its role as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay confront the nearest edge of the development area directly, yet no place-based appraisal has been undertaken to understand the implications for their local setting, economy, or community life. This omission significantly undermines the reliability of the environmental and heritage impact evaluation, as it fails to address the direct and tangible effects on the people and livelihoods of Islay.

Similarly, for Colonsay and Oronsay, the development's impact is intimately connected to the daily lived experience of these island communities, for whom the seaward outlook toward the array forms a defining element. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This acknowledgment highlights that harm to the internationally protected seabird population inhabiting these cliffs cannot be definitively ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Collectively, these deficiencies demonstrate that the application inadequately addresses the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the robustness and credibility of the overall environmental and heritage impact appraisal.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal

Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres and is assigned a medium magnitude of impact. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross, with Fionnphort—the gateway to Iona and the embarkation point for visitors—being the community most directly connected to the flow of visitors whose experience would be significantly affected. This admission underscores the potential for considerable impacts on local communities closely linked to tourism and visitor movements.

Similarly, across Mull as a whole, the applicant accepts significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout at distances ranging from

approximately 21 to 33 kilometres, yet the applicant attributes no more than a medium magnitude of impact. This appears to understate the potential effects on such a nationally recognised landscape, given its acknowledged sensitivity and the importance placed upon it.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant judges the scale of change to be small based primarily on the viewing distance of over 30 kilometres. This reliance on distance-based criteria tends to diminish the perceived significance of the impact, despite the industrialisation of the Atlantic seascape that supports Mull's west-facing tourism economy, wildlife boat operations, and the accommodation of western townships. Crucially, none of these communities have been subject to place-based assessment, leaving a gap in understanding the full extent of visual, economic, and community effects on these tourism-dependent areas.

The applicant's assessment significantly underestimates the potential impacts on important designated landscapes and vulnerable island communities, with practical consequences for their ongoing regeneration and preservation. For example, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island currently undergoing regeneration. This small, re-establishing community relies heavily on the qualities of its setting and unspoilt seascape, which are precisely those at risk from the proposed development. Yet, no specific assessment has been made regarding the effects on Ulva, thereby overlooking critical factors that could undermine the community's recovery and the natural qualities it depends upon.

Similarly, the applicant's treatment of other nearby designated landscapes appears to downplay the significance of potential effects. Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range that NatureScot advised for assessing effects on National Scenic Area qualities. Despite this, the applicant concludes that the scale of change would be small and the effect not significant, even though its own assessment recognises the panoramic maritime qualities of the area. The Jura National Scenic Area, valued for its wild, undeveloped Atlantic outlook, is assessed as having high sensitivity but is attributed only a medium to low magnitude of effect due to distance and retained landforms. A similar approach is taken for the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. This consistent minimisation of potential impacts fails to fully acknowledge the intrinsic qualities and designations of these landscapes, which warrants a more thorough and precautionary evaluation to ensure their protection.

The practical consequence of the applicant's assessment is a significant understatement of the impact on Tiree's landscape character, which undermines the reliability of the overall evaluation. The South Tiree coastal area has been assessed as having a High sensitivity at a distance of approximately 35 kilometres, yet it is attributed only a Low magnitude of change. This inconsistency raises concerns because such a Low magnitude does not align with the sensitivity rating assigned, suggesting that the effects on this receptor have not been fully or accurately accounted for.

Tiree’s landscape is exceptionally distinctive, characterised by its low-lying nature and the overwhelming presence of sea and sky. The highest point on the island, Ben Hynish, reaches only 141 metres, emphasising the flat and open nature of the terrain. Introducing turbines up to 335 metres in height represents an unprecedented vertical intrusion into this seascape, which is defined by uninterrupted oceanic horizons. Given this context, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor is clearly an understatement. This misjudgement leads to an unreliable assessment of the effects on Tiree’s sensitive landscape character, which should be recognised and addressed in the planning evaluation.

The applicant’s assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant’s distance-based moderation has been applied in this objection, calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant’s assessment cannot be regarded as comprehensive or sufficiently robust.

The applicant’s environmental impact assessment systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres, a practice that contrasts with more precise, place-based mitigation approaches applied within closer proximities. This distance-based methodology effectively reduces the perceived magnitude of change and downplays the significance of impacts on distant communities. Consequently, the assessment fails to apply tailored mitigation measures that reflect the actual sensitivity and lived experience of those receptors, undermining the robustness of the proposed environmental protections.

Critically, the evidence demonstrates that wherever a highly sensitive receptor exists beyond this 20-kilometre threshold, the magnitude of change is consistently moderated and the effect discounted, yet no place-based assessment is provided for these communities. This omission means that those living with potentially significant effects have not had their specific circumstances properly evaluated, resulting in an incomplete and potentially misleading appraisal of environmental consequences. Such systematic discounting beyond 20 kilometres therefore compromises the integrity and comprehensiveness of the environmental impact assessment as a whole.

1.1.508 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The longterm effect on wildlife, migration, quality of life.

Finally, I would also ask the Scottish Ministers to consider: There must be other solutions that don't spoil already precious fragile environments.

1.1.509 Summary

The proposal for the MachairWind Offshore Wind Farm has not been shown to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, the applicant’s published analyses reveal that the extent of these impacts has been underestimated, and that an essential heritage assessment remains incomplete. Although the effects on the island communities involved were identified, no thorough assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also important to note that the application before the Scottish Ministers does not encompass the entire project.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the related marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I propose that the applications be determined only following a public inquiry, providing an opportunity for detailed scrutiny of the issues raised in this objection. Regardless of the outcome, I also ask that the Ministers explicitly address and record their conclusions concerning the effects on cultural heritage and the island communities affected by the development within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 151
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced as application 00012385 under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for the development of an offshore wind generating station with an estimated capacity of approximately 2 gigawatts. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres. This site is located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and lies in proximity to the islands and coastal communities of the southern Hebrides.

The objections detailed in the following sections are grounded in both planning and environmental considerations, evaluated against the statutory and policy frameworks governing the determination of such applications. It is important to emphasise that the burden of proof lies firmly with the applicant to provide adequate and compelling evidence that all relevant statutory tests and policy requirements are met. Conversely, objectors are not obliged to substantiate contrary claims. Upon careful examination of the evidence presented, it is evident that the applicant has failed to satisfy this burden. Accordingly, the conclusion drawn is that consent for the proposed development should be withheld.

I request that this objection be formally registered and that I be kept informed of any decisions made in relation to these applications.

1.1.510 Legislative and Policy Framework

The application fails to adequately address the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on those interests. In determining the application, the Scottish Ministers are also required to have regard to these same statutory duties.

The evidence before the determining authority does not demonstrate compliance with these requirements. There are clear deficiencies and omissions in the applicant’s consideration of the impact on natural beauty and conservation interests, as well as inadequate measures proposed to mitigate adverse effects. These shortcomings represent a failure to meet the statutory obligations imposed by Schedule 9. Given these unresolved conflicts with the applicable legal and policy framework, the application should be refused consent.

The marine licence application is subject to determination under Part 4 of the Marine (Scotland) Act 2010 and must be assessed in accordance with Scotland’s National

Marine Plan unless relevant considerations indicate otherwise. The statutory framework requires that the proposal complies with a range of General Policies, notably GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies collectively form an integral part of the statutory assessment process for the application.

However, the application fails to demonstrate compliance with these statutory requirements and relevant policies of the National Marine Plan. The evidence identifies deficiencies and omissions in the submission, including inadequate consideration of cumulative impacts and insufficient engagement as required by GEN 18. Furthermore, the application does not provide sound evidence to satisfy the requirements of GEN 19, nor does it adequately address potential effects on the historic environment and landscape designations as stipulated in GEN 6 and GEN 7. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the absence of demonstrated compliance, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan. In accordance with the established legal position, such failures weigh decisively against the granting of consent for the proposed marine licence. Therefore, the application should be refused on these grounds.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address critical areas including biodiversity, natural places, historic assets, and energy. The application does not provide sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Furthermore, there is a lack of clarity and completeness regarding the safeguarding of historic assets and the sustainable energy provisions required by the framework. This absence of demonstrated mitigation measures directly conflicts with the statutory duties and legislative requirements that must be applied alongside the National Planning Framework 4.

Given that compliance with these key policies has not been established, and considering the identified deficiencies and omissions within the submitted evidence, the proposal is in conflict with the applicable legal and policy framework. National Planning Framework 4 is a significant material consideration, and where such conflicts exist, they weigh decisively against the granting of consent. Therefore, the proposal should be refused on the basis that it fails to meet the essential policy requirements designed to protect biodiversity, natural places, historic assets, and energy sustainability as mandated by the National Planning Framework 4.

The submitted application fails to provide an adequate Environmental Impact Assessment (EIA) as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental

effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making authority cannot properly evaluate the environmental consequences of the development, which is a fundamental legal requirement. This deficiency alone constitutes a clear failure to meet statutory obligations and weighs decisively against the granting of consent.

Furthermore, the application does not satisfy the requirements of the Habitats Regulations, which demand that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence confirms that compliance with these regulations has not been demonstrated, and there are identifiable omissions and conflicts with the legal and policy framework governing protected habitats. Such shortcomings undermine the integrity of the assessment process and contravene established environmental protection standards. In line with the statutory guidance, these unresolved issues must be given significant weight in the determination process, resulting in a firm objection to the proposal.

The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous in its intent to ensure that island communities are properly represented and their unique circumstances fully accounted for in planning decisions.

In the case of the current proposal, there is a failure to demonstrate compliance with this requirement. The evidence before the determining authority does not show that the interests of island communities have been adequately considered or appropriately weighted. Furthermore, the documentation reveals deficiencies and omissions in addressing these statutory duties, resulting in a conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018.

Given these shortcomings, the proposal does not meet the necessary legal standards. Where compliance with the Act has not been demonstrated, and where evidence identifies such deficiencies and conflicts, these matters must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, this proposal should be refused.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This evidential burden is essential to ensure that every statutory duty, planning policy, and environmental assessment obligation is fully satisfied. In this case, the applicant’s submissions do not provide the necessary assurance that these critical criteria have been met.

Furthermore, the evidence presented reveals clear deficiencies and omissions in addressing the applicable legal and policy framework. These shortcomings undermine confidence in the proposal’s conformity with statutory and planning obligations. Where such compliance is not demonstrated, the weight of planning

judgment must be directed against the granting of consent, as the statutory and policy frameworks are designed to safeguard public and environmental interests.

In conclusion, the absence of adequate evidence to prove full compliance with all legal and policy requirements constitutes a significant and determinative failing. This failure alone justifies refusal of the application, as it conflicts with the established principles that govern the planning process and the statutory duties incumbent upon the applicant. Consent should therefore be withheld.

1.1.511 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria set forth in NPF4 Policy 11, which explicitly governs the conditions under which renewable energy developments may proceed. While Policy 11 endorses renewable energy projects, this support is conditional upon compliance with specific impact requirements, notably those concerning the effects on communities (Policy 11(c)) and on landscape, seascape, and other receptors (Policy 11(d) and 11(e)). The evidence demonstrates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been substantiated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that the interests and wellbeing of island communities would be safeguarded. The ecological assessments provided have similarly failed to demonstrate that the requisite environmental tests can be met.

These shortcomings collectively indicate that the proposal is in clear conflict with the impact criteria of NPF4 Policy 11. The adverse effects on nationally protected landscapes and seascapes alone constitute a material consideration against the development. The absence of robust evidence to protect the cultural heritage assets and to safeguard island communities further undermines the proposal’s compliance with Policy 11. Equally, the failure to meet ecological standards raises significant concerns about the sustainability of the project. Taken together, these factors strongly suggest that the proposal cannot be supported under the policy framework intended to ensure renewable energy developments proceed without unacceptable harm.

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily

demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

Uncertainty remains regarding the extent to which the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. The concerns centre on the adverse effects the development would have on the landscape, heritage, and community interests that these policies are explicitly designed to protect. This raises significant questions about the proposal's compatibility with local planning objectives intended to safeguard these valued aspects of the environment and society.

In light of these conflicts, it is evident that the proposal does not accord with the development plan framework, nor with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise. Consequently, the proposal should be regarded as inconsistent with the relevant planning policies, and this inconsistency weighs heavily against its approval.

1.1.512 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet evidence indicates a clear pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This implicit distance-based moderation is corroborated by the applicant's own documents, which acknowledge that at viewing distances exceeding 30 kilometres, the scale of change is judged as small, and that High magnitude effects are confined to within about 20 kilometres, Medium effects between approximately 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the inputs to the protective assessments are systematically understated at precisely the distances where the most sensitive designated landscapes are located, undermining the reliability of the conclusions presented to the Scottish Ministers for their consent decision.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings

subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The proposal fails to demonstrate adequate mitigation in comparison to the requirements set out in relevant planning policies protecting landscape and seascape interests. The applicant has not shown that its assessment of the scale of the accepted effects aligns with its own methodology, thereby undermining the reliability of its conclusions. As a result, the proposal does not comply with National Planning Framework 4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), or GEN 7, nor does it meet the standards outlined in paragraph 4.28 of the National Marine Plan. This shortfall indicates a failure to safeguard nationally important landscapes and seascapes as mandated by these policies. Consequently, the proposal does not accord with the necessary policy framework and should not be supported.

1.1.513 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts adheres to Historic Environment Scotland's established methodology, which rightly distinguishes between visual change and adverse impact on the setting of historic assets. This methodology emphasises the need to evaluate whether alterations affect the contribution that setting makes to cultural significance and to determine if the integrity of that setting is preserved. It explicitly recognises that visual alterations alone should not be equated with harm, thereby providing a nuanced framework for assessing heritage impacts.

However, a Methodological Audit, conducted independently from the applicant's Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes and describes visual changes such as visibility, distance, and screening, it fails to demonstrate the critical evaluative step required by the adopted methodology. The assessment does not show how the integrity of setting has been properly appraised against the criteria it accepts, merely concluding that it is adequately retained without substantiating this judgment. This omission undermines

the reliability of the assessment's conclusions regarding heritage impacts and calls into question the robustness of the applicant's overall evaluation.

While the applicant's assessment recognises certain mitigation measures aimed at reducing harm to heritage assets, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that confer significance. The baseline evidence acknowledges that the cultural value of the affected heritage assets is not solely derived from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. This suggests that mitigation focused primarily on fixed viewpoints may fall short of fully preserving these experiential aspects.

Historic Environment Scotland's consultation responses, as recorded within the application, underscore this concern by requesting additional viewpoints to better capture the wider cultural qualities. Their input implies that the existing assessment may not sufficiently represent the spatial and sensory relationships between monuments, the surrounding landscape, and seascape. Such relationships are integral to understanding heritage significance, as they are experienced through movement rather than from isolated vantage points.

In light of these considerations, it appears that the assessment's current approach may understate the importance of the broader cultural landscape and its experiential dimensions. Consequently, further evaluation and potentially enhanced mitigation measures are warranted to ensure that the full range of heritage values is appropriately recognised and conserved.

The applicant's heritage conclusions are fundamentally reliant on the findings of the landscape assessment. This dependency is critical, as the landscape assessment forms the evidential foundation upon which the heritage impact conclusions are constructed. Any shortcomings or inaccuracies within the landscape evaluation inevitably influence the validity of the heritage assessment.

It has been demonstrated that the landscape effects have been understated, as outlined in the preceding analysis. This understatement is not a trivial matter; rather, it represents a significant deficiency that affects the overall appraisal. Because the heritage conclusions are predicated on the landscape assessment, any minimisation of landscape impacts is directly transmitted into the heritage impact findings, thereby diminishing their reliability.

Consequently, the credibility of the heritage conclusions is compromised by the inherent weaknesses within the landscape assessment. A more robust and accurate landscape evaluation is essential to ensure that the heritage impacts are properly understood and fairly assessed. Without addressing these deficiencies, reliance on the current heritage conclusions remains questionable and potentially misleading.

The application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it does not satisfy the provisions set out in National Planning Framework 4 (NPF4), including Policy 7(h) relating to scheduled monuments, Policies 7(c) and 7(d) regarding setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively

establish a clear framework for safeguarding the cultural significance of heritage sites.

Moreover, the applicant has not provided the necessary demonstration that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Without such evidence, Scottish Ministers lack the assessment required to conclude that the development would not adversely affect these assets. This omission represents a fundamental gap in the application's evidence base.

In conclusion, due to the failure to meet key policy obligations for heritage protection and the absence of a comprehensive assessment, the proposal cannot be considered acceptable. It is therefore recommended that the application be refused on the grounds of non-compliance with relevant heritage protection policies.

1.1.514 Effects on Island Communities, Tourism and the Local Economy

There is a significant uncertainty regarding the impact of the proposed development on the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors who are attracted by specific qualities identified in the applicant's own baseline assessments, including landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these attributes could have serious repercussions.

The qualities that draw visitors are not incidental but form the core of the local economic base. Should these be compromised, the resulting decline in visitor numbers would directly threaten the provision of local services, the stability of resident populations, and ultimately the ongoing viability of these island settlements. This interdependence underscores the fragility of the communities' economic and social structures.

Given the reliance of these island communities on the very characteristics that may be affected, it is essential to consider carefully whether the proposal can be supported without undermining their sustainability. The potential consequences for both economy and community warrant a cautious and thorough evaluation before any development proceeds.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that

are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

There remains significant uncertainty as to whether the proposal complies with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan mandate that decisions be based on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process. However, the applicant has acknowledged the need for particular scrutiny of island communities yet failed to conduct the necessary assessment to understand the potential impacts on them. Consequently, there is no demonstrated compatibility with the principles of sustainable island communities, and the statutory duties owed to these communities have not been satisfactorily discharged. In light of these shortcomings, the proposal does not meet the required planning and statutory standards, and therefore cannot be supported.

1.1.515 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where the possibility of

an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application is therefore a noteworthy aspect, as it indicates the applicant's acknowledgment of potential impacts. Moreover, the applicant's own position implies that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. In light of this, the submission of these derogation and compensation documents reflects a recognition of the need to address and mitigate possible harm to protected species and sites under the relevant statutory provisions.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not alone satisfy the stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected habitats and species. The competent authority must be satisfied, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are fulfilled. This high evidential standard places the burden squarely on the applicant to demonstrate compliance, as partial or proposed measures cannot substitute for definitive proof. This legal framework is further reinforced by GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4, which collectively underscore the imperative for rigorous assessment and certainty prior to consent. Consequently, any planning decision must reflect this exacting threshold, ensuring that the statutory tests are met unequivocally before development proceeds.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed to approval. The evidence submitted, including the applicant's own derogation documents, reveals a fundamental shortcoming in meeting the legal requirements designed to protect internationally important habitats and species. These statutory tests are established to ensure that any potential adverse impacts on critical ecological features are properly assessed and, where necessary, mitigated or avoided. However, the applicant's documentation fails to provide the necessary degree of certainty that these tests can be satisfied. Without this assurance, the proposed development poses an unacceptable risk to internationally designated ecological assets. Consequently, the application does not fulfil the statutory obligations and should not be granted consent.

1.1.516 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts

whose individual impacts might appear less significant. By effectively “salami-slicing” the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project’s true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

The cumulative impact assessment presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment (EIA). As established, the underlying evaluations of landscape, heritage, and socio-economic effects have been shown to understate the true scale of impacts. Consequently, the baseline from which the cumulative effects are measured is inherently reduced, reflecting an incomplete or diminished understanding of the existing environmental and social context.

This flawed baseline directly compromises the reliability of the cumulative assessment. When the combined effects of the current proposal are considered alongside other existing, consented, and foreseeable developments, the aggregated impacts are likewise underestimated. Therefore, the cumulative assessment fails to provide a robust or accurate account of the true scale of combined effects, undermining its utility for informed decision-making and potentially leading to inadequate mitigation or planning responses.

There remains significant uncertainty regarding the applicant’s compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project’s total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.517 Public Engagement, Site Selection and Environmental Information

The consultation process surrounding this application has resulted in a practical consequence that undermines the legitimacy of the site-selection exercise itself. The

applicant requests that Scottish Ministers accord significant weight to the site-selection process; however, the quality of public participation during both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The sheer volume of technical documentation, spanning many thousands of pages, presents an unreasonable burden on affected communities. Moreover, the consultation period coincided with the busiest months of the year for island residents, who are engaged intensively throughout the visitor season and have limited access to specialist advice during this time. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, creating an imbalance that disadvantages public contributors.

This imbalance directly conflicts with the standards of effective public participation enshrined in GEN 18 of the National Marine Plan and the principles embodied in the Aarhus Convention. These frameworks require that individuals and communities affected by decisions of this magnitude have a realistic and meaningful opportunity to engage in the process. The conditions under which the island communities have been expected to respond fall short of this required standard. Consequently, the consultation cannot be regarded as genuinely inclusive or adequate in facilitating informed public input. This failure to meet established participation principles diminishes the credibility and transparency of the decision-making process.

Accordingly, it is imperative that Scottish Ministers give careful consideration to these representational concerns when weighing the merits of the application. The deficiencies in public engagement not only diminish trust in the process but also raise serious questions about whether the application has been subject to sufficient scrutiny by those most directly affected. Upholding the standards of effective and equitable public participation is essential to ensuring that any decision taken is both legitimate and justifiable.

The Environmental Impact Assessment (EIA) submitted with this application fails to provide sufficient information for the Scottish Ministers to make an informed decision, as required by the EIA Regulations. Although the assessment identifies pathways to significant effects across multiple topics, it does not investigate these effects adequately. For example, the landscape assessment relies on a distance pattern outcome not supported by its own methodology; the heritage assessment does not apply its stated integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands. These shortcomings demonstrate that the EIA is insufficiently robust in its current form.

Moreover, the application frequently depends on future assessments, post-consent plans, ongoing monitoring, and further approvals to address outstanding issues. Such reliance is inconsistent with the statutory requirement that likely significant effects must be clearly understood prior to determination. The procedural framework obliges the decision-makers to have comprehensive and conclusive environmental information at the time of consideration, not to proceed on the assumption that unresolved matters will be satisfactorily dealt with later.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to properly assess the potential

impacts of the proposal. As the principal evidential basis for the decision, the EIA must be sufficient in scope and detail at the point of determination, which is not the case here. Therefore, the application should not be approved in its current form.

1.1.518 Effects on Local Area

The applicant's assessment fails to adequately recognise and address the direct and significant impacts that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the nearest inhabited islands to the development site, which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay. Yet, the application primarily considers Islay only in terms of its potential as a direct project location rather than as a community likely to experience substantial effects. Notably, Islay's Atlantic-facing communities confront the closest edge of the development area, but there is no place-based assessment of how this proximity might affect their setting, local economy, or community life.

In relation to Colonsay and Oronsay, the seaward outlook, which is integral to daily life and identity, directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to an internationally protected seabird population associated with these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting insufficiently addressed. The previously identified deficiencies in the heritage assessment apply fully to this feature, further highlighting the inadequacy of the appraisal of impacts on local heritage assets.

Given these considerations, the applicant's evaluation does not provide a comprehensive or reliable account of the effects on these island communities and their significant environmental and cultural receptors. This underassessment risks overlooking adverse consequences that would be materially relevant to planning decisions, and as such, the assessment should be revisited to ensure that the impacts on Islay, Colonsay, and Oronsay are properly and fully accounted for.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility. The assessment identifies a large geographical extent of change, encompassing approximately 21 kilometres and a turbine horizon spanning around 39 degrees. Effects at the ferry crossing between Fionnphort and Iona are specifically noted, with the overall impact described as moderate and significant. Similarly, the west coast of Iona is acknowledged as highly sensitive, with widespread visibility of the turbines, and the applicant accepts that significant effects will be experienced by both residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of international heritage importance, with its

significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as outlined in the applicant's own baseline studies. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits the understanding of the visual and heritage effects on key cultural receptors.

Community concerns further highlight the potential severity of the proposal's impacts. A household consultation on Iona found that 92 per cent of respondents object to the development, yet the applicant's assessment does not address habitability, despite its consultants recognising this as a potential pathway of effect on the local community. To illustrate the perceived scale, Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at around 33 kilometres, would be overtopped by the tallest turbines by approximately 194 metres, despite the turbines being located at roughly two-thirds of that distance. Taken together, these factors indicate that the visual, community, and heritage impacts on Iona have been significantly underestimated, compromising the accuracy of the overall environmental and social impact evaluation.

The applicant's assessment leads to practical consequences that risk undervaluing the true extent of impacts on the Ross of Mull South coastal area and its communities. Although significant effects are acknowledged at Erraid and along the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and primary embarkation point for visitors—the assessment assigns only a Medium magnitude to these changes despite recognising the high sensitivity of the area at distances of 22 to 24 kilometres. This approach fails to adequately reflect the importance of Fionnphort, whose community is intimately linked to the flow of visitors, and which would therefore experience material socio-economic and experiential effects.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area, as well as on the Loch na Keal National Scenic Area, which is of High sensitivity throughout a zone extending 21 to 33 kilometres. Yet, no higher than a Medium magnitude is attributed to these impacts. Moreover, the applicant's reliance on distance-based criteria, exemplified by the dismissal of effects around the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, inadequately captures the scale of change. This is particularly concerning given that Mull's west-facing tourism economy—including wildlife boat operations and accommodation services—depends heavily on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessments have been conducted for these western communities, leaving a significant gap in understanding the full extent of potential economic and landscape consequences.

While the applicant's assessment acknowledges some potential effects on designated landscapes and island communities, it notably underestimates or omits significant impacts that warrant closer scrutiny. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island currently undergoing regeneration. The recovery of this small, re-establishing community relies heavily on the intact qualities of its setting and unspoilt seascape—precisely

those elements potentially compromised by the development. Yet, no assessment has been undertaken to evaluate these effects on Ulva's natural and cultural environment. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies around 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite this, the applicant concludes that the scale of change at Staffa would be small and not significant, notwithstanding the panoramic maritime qualities that their own assessment recognises. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only a medium to low magnitude of effect, justified by factors such as distance, apparent scale, and retained landforms. However, this conclusion appears to underplay the importance of the designation's foundation on the wild, undeveloped character of its Atlantic outlook. A similar approach is applied to the Scarba, Lunga and Garvellachs National Scenic Area, situated about 35 to 40 kilometres from the development, where comparable assumptions are made. Taken together, these considerations suggest that the applicant's assessment may not fully capture the extent of effects on these valued landscapes and island communities. Consequently, the protection of their natural and cultural qualities remains inadequately assured.

The applicant's assessment acknowledges the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes the magnitude of change to be Low. This characterisation forms the basis for the evaluation of effects on Tiree's landscape. However, the assessment's attribution of Low magnitude appears inconsistent with the island's intrinsic landscape qualities.

Tiree is an exceptionally low-lying island, with its entire landscape character defined by the dominance of sea and sky. The island's highest point, Ben Hynish, reaches only 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height represents the insertion of vertical structures without precedent in Tiree's seascape. Such a scale of development would be a dominant and alien feature on an otherwise open oceanic horizon.

Consequently, the conclusion of Low magnitude change for a receptor of such exposure and sensitivity seems to significantly understate the likely effects. This understatement leads to an unreliable evaluation of the landscape impacts on Tiree, and warrants careful reconsideration to more accurately reflect the scale of visual and character change that would result.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment,

thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's reliance on a distance-based approach to assess environmental effects results in a systematic underestimation and discounting of significant impacts on sensitive receptors located beyond 20 kilometres from the development site. This methodological choice has a practical consequence: important changes experienced by these distant communities are not given appropriate weight in the environmental impact assessment. Consequently, the assessment does not accurately reflect the true extent or significance of effects that occur beyond this arbitrary distance threshold.

In examining the evidence, it becomes clear that wherever the applicant's assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is deliberately moderated and the effect discounted. This means that although these receptors may be affected to a considerable degree, the assessment process effectively diminishes their experience of impact. Such an approach fails to provide a comprehensive or place-specific analysis for these communities, thereby compromising the assessment's integrity and robustness.

The absence of a place-based assessment for communities beyond 20 kilometres undermines the environmental impact assessment's ability to fully inform decision-makers and the public. Without acknowledging and properly evaluating the effects experienced by these sensitive receptors, the applicant's approach risks overlooking meaningful environmental and social consequences. It is therefore essential that the assessment methodology be revised to accurately capture and weigh the significance of effects at all relevant distances, ensuring a thorough and credible evaluation.

1.1.519 Personal Observations

Based on my own local knowledge, I also wish to highlight that: I and my family regularly visit the areas on the islands which will be adversely affected by this project.

1.1.520 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements, as demonstrated by the applicant's own evaluation. This assessment acknowledges considerable impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, subsequent scrutiny of the applicant's documentation reveals that these

impacts have been consistently underestimated. Furthermore, the essential heritage assessment has not been undertaken, and although the adverse effects on the island communities within the project's vicinity were identified, they have never been subjected to a thorough evaluation. The ecological criteria necessary for approval have not been demonstrated as achievable, and notably, only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider granting approval, I request that they require the submission of further environmental information alongside enhanced visual representations. Additionally, I propose that the applications be determined only following a public inquiry, thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the ultimate decision, I further request that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 152
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (operating as ScottishPower Renewables), seek authorisation for an offshore wind development with an anticipated capacity of approximately 2 gigawatts. The scheme envisages the erection of between 91 and 144 turbines, each with a maximum tip height of 335 metres, situated within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

I request that my objection be formally recorded, that I am registered as an objector, and that I receive notification of the final determination on these applications.

The following outlines the planning and environmental grounds for my objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the responsibility to satisfy the relevant statutory tests rests solely with the applicant, who must provide adequate and convincing evidence to justify consent. Objectors are not obligated to disprove the proposals. Upon careful consideration of the evidence presented, it is clear that the applicant has not fulfilled this burden. Consequently, the applications should be refused consent.

1.1.521 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these requirements have been sufficiently addressed or fulfilled.

In addition, the Scottish Ministers, as the determining authority, are mandated by the same statutory duties to have regard to these considerations when deciding the application. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the evidence submitted, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for this proposal.

The marine licence application under consideration must be determined in strict accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set forth in Scotland’s National Marine Plan. The statutory framework mandates that

authorisation decisions align with the National Marine Plan unless relevant considerations indicate otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish the criteria against which the application must be evaluated.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence submitted fails to adequately address the requirements of GEN 4 concerning co-existence, which is critical to ensuring that the proposed development does not adversely affect existing marine activities and uses. Furthermore, the application does not satisfactorily engage with the historic environment policies GEN 6 and the related paragraphs 4.22 to 4.23, leaving significant uncertainty regarding potential impacts on heritage assets. Similarly, the provisions of GEN 7 and paragraph 4.28 relating to landscape and national scenic areas have not been met, as the application lacks sufficient assessment or mitigation measures to protect these designated landscapes.

The natural heritage considerations under GEN 9 are also inadequately addressed, with omissions in the evidence base that undermine confidence in the protection of marine biodiversity and habitats. The engagement requirements stipulated by GEN 18 have not been fulfilled, as the application does not demonstrate meaningful consultation or involvement of relevant stakeholders. Crucially, the application falls short of the standards set by GEN 19 and paragraph 4.81 concerning sound evidence; the data and assessments provided are incomplete or insufficiently robust to support a lawful and informed decision. Lastly, the cumulative impacts policy GEN 21 and paragraph 4.85 have not been properly considered, with the application neglecting to evaluate the combined effects of the proposal alongside existing and planned marine activities.

Given these substantive deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the statutory requirements for marine licence determination. As established by the Marine (Scotland) Act 2010 and the National Marine Plan, such failures weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds that it does not comply with the statutory policies and evidential standards necessary for lawful authorisation.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely impact these key environmental and heritage considerations. The application lacks sufficient evidence to confirm that the necessary measures to protect and enhance biodiversity and natural places have been incorporated, nor does it adequately address the preservation of historic assets or the sustainable energy criteria mandated by the framework.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a clear conflict with the applicable legal and policy framework. As such, these unresolved matters weigh decisively against the granting of consent for the proposal. Without satisfactory resolution of these fundamental policy breaches, the application cannot be supported.

The application fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations require that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. The submitted documentation does not meet this statutory requirement, lacking a comprehensive and robust assessment of environmental impacts. This deficiency undermines the decision-making process by failing to present the necessary evidence to evaluate the proposal's environmental consequences fully.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any demonstration of compliance, constitutes a clear breach of legal obligations. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh decisively against the granting of consent. Given the failure to satisfy these fundamental statutory requirements, the proposal should be refused.

The applicant's submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and afforded due weight in the decision-making process. This legislative mandate is clear and unequivocal, as set out in the Act and reiterated in the applicant's own evidence (S01). The Act imposes a legal obligation on the determining authority to ensure that the unique circumstances and needs of island communities are properly integrated into the planning assessment.

However, a detailed examination of the proposal and its supporting documentation reveals a failure to demonstrate compliance with this statutory requirement. There is a conspicuous absence of any substantive analysis or evidence that specifically addresses how the interests of the relevant island communities have been identified, evaluated, or balanced against the proposed development. The applicant's evidence does not provide any indication that the decision-making process has given due weight to these interests, as mandated by the Islands (Scotland) Act 2018.

Furthermore, the lack of consideration constitutes a procedural deficiency and an omission that conflicts directly with the applicable legal and policy framework. The statutory duty is not discretionary; it requires active and demonstrable engagement with the interests of island communities. The failure to do so undermines the integrity of the planning process and renders the proposal non-compliant with the statutory requirements. As established in the applicant's own evidence (S01), where

compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are identified, these matters must weigh against the granting of consent.

In conclusion, the proposal fails to meet the statutory obligations imposed by the Islands (Scotland) Act 2018 due to the absence of proper consideration and due weighting of island community interests. This failure constitutes a significant procedural and substantive deficiency that conflicts with the legal and policy framework governing the development. Accordingly, this deficiency weighs decisively against the approval of the proposal.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It is an established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence does not meet this evidential burden.

Specifically, the application lacks sufficient demonstration that all statutory duties have been addressed, and there are clear deficiencies and omissions within the supporting documentation. These shortcomings result in unresolved conflicts with the applicable legal and policy framework. Such failures are material and significant, as the absence of conclusive evidence confirming compliance undermines the legitimacy of the application.

Given these evidential deficiencies and the applicant’s failure to meet the required standard of proof, the proposal cannot be considered compliant with the statutory and policy framework governing the development. Consequently, these unresolved matters must weigh decisively against the granting of planning consent.

1.1.522 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy’s support for renewable energy development. Specifically, it would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected. Additionally, the proposal does not show that island communities would be safeguarded, nor has it been established that the ecological requirements can be met based on the evidence provided. NPF4 Policy 11 supports renewable energy development only insofar as these impact criteria—including those addressing effects on communities and on landscape, seascape, and other receptors—are satisfied. The failure to meet these tests means the proposal conflicts with the policy’s provisions and cannot be regarded as compliant.

In considering the proposal against the suite of relevant NPF4 policies designed to protect designated assets, it is notable that mitigation measures have not sufficiently addressed the range of potential adverse effects. Policy 11, together with Policies 4(c) and 4(d), establishes clear protections for National Scenic Areas and nationally important landscapes, aiming to prevent significant harm to the qualities for which

these areas are recognised. The evidence demonstrates that the proposal would result in significant adverse effects on these designated landscapes and seascapes, indicating that the mitigation measures proposed are inadequate to uphold the standards set by these policies.

Furthermore, the proposal must be assessed in relation to the safeguarding of cultural heritage. Policy 7, including its subsections 7(h), 7(c), and 7(d), requires that scheduled monuments and their settings are protected, recognising their cultural significance. The evidence before the decision-maker does not satisfactorily demonstrate that the proposal would avoid harm to these heritage assets or their settings. This lack of demonstrated protection represents a clear conflict with the policy framework intended to preserve nationally important historic assets.

Lastly, the ecological implications of the proposal must be considered under Policy 3 on biodiversity. The assessment concludes that the ecological tests set out within this policy have not been convincingly met based on the evidence submitted. Additionally, the proposal fails to show that the interests of island communities would be safeguarded, further underscoring its shortcomings in meeting the comprehensive requirements of NPF4. Taken together, these points indicate that the proposal does not comply with the full range of policies designed to protect designated landscapes, heritage assets, and biodiversity.

The applicant has not provided evidence to demonstrate that the proposed development incorporates sufficient mitigation to address the adverse effects identified in relation to the terrestrial environment. In comparison to the protections afforded by the Argyll and Bute Local Development Plan 2, the proposal fails to safeguard the landscape, heritage, and community interests that these policies explicitly seek to preserve. This lack of adequate mitigation results in a clear discordance between the development and the established local policy framework.

Consequently, the proposal stands in direct conflict with the relevant provisions of the development plan, as well as with the overarching objectives set out in National Planning Framework 4 when considered in its entirety. Given the absence of compelling justification or effective mitigation measures, the proposal does not align with the statutory planning framework and should be regarded as inconsistent with the terrestrial development plan policies that are material to land-based effects.

1.1.523 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is a systematic understatement of the potential effects on the most sensitive designated landscapes, which are often located beyond 20 kilometres from the development area. This underrepresentation arises because the methodology does not explicitly define any distance threshold beyond which major effects cease. Nevertheless, an independent Evidence Note, drawing solely on the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of its sensitivity or the extent of its visibility to the development.

Further scrutiny of the applicant's documentation confirms the influence of distance on effect magnitude judgements. For instance, a coastal area more than 30 kilometres from the site is assessed as experiencing only a small scale of change due to the viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This gradation clearly demonstrates a built-in moderation of impact severity correlated with distance, which may not fully capture the true sensitivity and experiential quality of landscapes at these outer distances.

Consequently, the protective tests designed to safeguard landscape and visual amenity are being applied to inputs that systematically diminish the perceived magnitude of effects at the critical distances where the most sensitive designated landscapes are situated. As a result, the conclusions drawn by the applicant do not provide a reliable or comprehensive description of the effects on these landscapes. This undermines the decision-making process by Scottish Ministers, who are therefore being asked to consent based on an incomplete and potentially misleading assessment of impact.

When considering the visual impact of the proposed development, it is important to compare the extent to which mitigation measures can address potential adverse effects. While landscaping and screening can reduce visibility from certain viewpoints, the effectiveness of such measures is inherently limited by the nature of the terrain and the scale of the development. This highlights the need for a careful and nuanced assessment of visual impacts, rather than reliance on visualisation materials alone.

The visual evidence presented in support of the application follows NatureScot's visualisation guidance, which the applicant adopts. This guidance acknowledges a fundamental limitation: printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Consequently, the images and wireline drawings—although useful—are constrained by the same photographic basis and do not independently correct the viewer's perception. The wireline drawings, presented within the panoramic projections, serve as a technical overlay rather than a definitive representation of the development's visual presence.

Given these technical and perceptual limitations, it is essential that decision-makers exercise caution when interpreting the visualisation materials. They should consider the potential discrepancies between the images and the actual experience on site, particularly in relation to the scale and prominence of the development. Such an approach ensures a balanced assessment that recognises the value of the visualisations while acknowledging their inherent constraints.

The introduction of aviation and navigation lighting to a previously unlit sea horizon will result in a permanent alteration of the night-time seascape character throughout the 35-year operational life of the development. This practical consequence is significant, as the current state of the seascape is defined by its natural darkness, an intrinsic aspect of its character that would be fundamentally changed by the presence of artificial lighting. The visual intrusion caused by such lighting is not a

temporary or reversible effect; it represents a sustained transformation that will be experienced continuously over more than three decades.

From a policy perspective, the implications of consenting to this development extend beyond the immediate operational timeframe. Although the 35-year life sets a temporal boundary on the physical presence of the lighting, it does not limit the policy harm associated with this change. A decision to grant consent effectively signals that this particular seascape is deemed appropriate for wind farm use, including its associated impacts such as the introduction of night-time lighting. This acknowledgment carries weight in future planning considerations, potentially establishing a precedent for accepting similar visual impacts in the area.

In conclusion, the permanent introduction of night-time lighting to the seascape constitutes a material change to its character that cannot be overlooked. The policy framework must therefore carefully weigh the acceptability of such a transformation, recognising that consent implies an endorsement of the seascape's suitability for wind farm development despite the significant alteration of its night-time qualities. It is essential that these considerations are fully accounted for in any decision-making process.

The applicant's proposals fail to demonstrate adequate mitigation in relation to the significant effects identified on nationally important landscapes and seascapes. While some measures have been suggested, these are insufficient when assessed against the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The absence of robust mitigation measures undermines confidence that the proposal can appropriately safeguard the visual and environmental qualities these policies seek to protect.

Furthermore, the applicant has not substantiated that its conclusions regarding the scale of the accepted effects align with the methodology employed in its own assessments. This lack of consistency raises serious concerns about the reliability of the environmental impact evaluation and, by extension, the proposal's compliance with key planning policies aimed at conserving nationally important landscape and seascape interests. In light of these shortcomings, the proposal does not meet the necessary policy standards and should not be supported.

1.1.524 Cultural Landscape, Archaeology and Historic Environment

There is significant uncertainty regarding the reliability of the applicant's heritage impact assessment due to apparent non-compliance with the prescribed evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been followed—an approach that emphasises assessing whether changes to setting affect its contribution to cultural significance and whether the integrity of setting is retained, explicitly cautioning against equating visual change with adverse impact—the evidence indicates otherwise. A Methodological Audit, conducted independently and based solely on the applicant's own Appendix 14.3, finds that while the assessment identifies relevant heritage attributes and describes various aspects of visual change such as visibility, distance, and monument prominence, it fails to demonstrate the critical evaluative step required by the

methodology: a clear assessment of how the integrity of setting has been maintained. In other words, the conclusion that the integrity of setting is adequately retained is not substantiated by the analysis presented. This omission calls into question the robustness and validity of the applicant's conclusions on heritage impacts.

The applicant's own baseline assessment acknowledges that the cultural significance of the heritage assets affected by the proposal is derived from a complex interplay of qualities. These include elements such as pilgrimage routes, arrival by sea, and the experience of movement through a living cultural landscape. Furthermore, the significance arises from the relationships between monuments, spirituality, and the surrounding landscape and seascape. Importantly, this significance is understood to be experienced dynamically, through movement, rather than from fixed viewpoints alone.

Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—highlight a concern that the assessment may not fully capture these broader experiential qualities. They specifically requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its associated values are properly represented in the heritage impact appraisal. This suggests that the assessment, as presented, may inadequately reflect the full baseline qualities and cultural significance of the heritage assets in question, potentially leading to an incomplete understanding of the proposal's impacts.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. This dependency is critical, as the evaluation of heritage effects draws directly from the characterisation and magnitude of landscape changes identified. Where the landscape assessment has understated potential effects, as has been demonstrated earlier, the heritage conclusions necessarily reflect that same understatement.

Such an approach raises concerns regarding the robustness and credibility of the heritage assessment. If the baseline understanding of landscape effects is incomplete or insufficiently rigorous, the subsequent heritage impact analysis, which is built upon this foundation, cannot be considered fully reliable. This interconnectedness means that any deficiencies or oversights in the landscape appraisal propagate through to the heritage conclusions, thereby undermining their validity.

Accordingly, a reassessment that addresses the identified shortcomings in the landscape evaluation is essential to ensure that heritage impacts are accurately characterised. Without rectifying these issues, the heritage conclusions remain compromised, limiting their usefulness for informed decision-making within the planning process. It is therefore necessary that the heritage assessment is revisited in light of a more comprehensive and precise landscape appraisal.

There remains significant uncertainty as to whether the application complies with key policy requirements concerning heritage protection. The proposal engages NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) on setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies

collectively establish a clear framework for safeguarding the cultural significance of internationally and nationally important heritage assets and their settings.

However, the applicant has failed to demonstrate adequately that these heritage assets and their settings will be protected. Crucially, the Scottish Ministers do not have before them the comprehensive assessment necessary to support such a conclusion. In the absence of this essential information, the application cannot be deemed acceptable in terms of heritage policy compliance.

1.1.525 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn to the very qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these attributes would directly undermine the economic foundations upon which these communities depend.

Such impacts would extend beyond mere economic considerations, affecting essential local services, population stability, and the overall viability of the island settlements. In compromising the qualities that attract visitors, the proposal risks destabilising the social and economic fabric of these communities, thereby threatening their long-term sustainability.

The applicant's own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities; however, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port communities while neglecting a comparable place-based evaluation of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. Such economies tend to be highly concentrated in sectors that are most vulnerable to changes in the environmental and experiential qualities that attract visitors. Moreover, a dependence on increasing visitor numbers does not diminish sensitivity; on the contrary, it intensifies the reliance on those qualities, thereby heightening vulnerability. Therefore, the conclusion of low sensitivity, reached without any place-based analysis of the island communities, lacks evidential support and amounts to an unsubstantiated assumption. This deficiency in the socio-economic assessment methodology calls into question the robustness of the applicant's understanding and mitigation of impacts on island communities.

In comparison to the rigorous mitigation requirements set out for environmental and socio-economic impacts elsewhere in the proposal, the assessment of effects on island communities is notably deficient. The proposal fails to meet the statutory and policy obligations established to protect these communities. Specifically, the National

Marine Plan's GEN 19 and paragraph 4.81 mandate that decisions affecting marine environments must be founded on robust socio-economic evidence and adopt a precautionary approach where data is insufficient. Moreover, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and afforded due weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process.

Despite recognising the particular scrutiny island communities require, the applicant did not undertake the necessary assessment to understand how the proposal would affect them. No evidence has been provided to demonstrate compatibility with the principles of sustainable island communities, nor that the statutory duties owed to these populations have been fulfilled. As such, the proposal falls short of the established planning and statutory standards, undermining the protection and consideration that island communities are entitled to under current policy and legislation.

1.1.526 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied

beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The applicant has not demonstrated that the statutory tests required to protect internationally important habitats and species can be satisfied. This conclusion is drawn from the evidence submitted, including the applicant’s own derogation documents, which reveal an insufficient degree of certainty regarding compliance. Without clear assurance that these legal protections are upheld, the application fails to meet the necessary statutory criteria, thereby undermining the justification for granting consent.

1.1.527 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project’s overall effects.

The cumulative impact assessment presented in the Environmental Impact Assessment relies fundamentally on the baseline conclusions derived from separate evaluations of landscape, heritage, and socio-economic factors. However, these underlying assessments have been demonstrated to understate the true extent of effects, as previously detailed. Consequently, the cumulative assessment inherits this diminished baseline, which means it does not fully capture the aggregate impacts when this proposal is considered in conjunction with other existing, consented, and foreseeable developments. This methodological shortfall results in a significant underestimation of the combined effects, thereby compromising the reliability of the cumulative impact assessment.

Given that the cumulative assessment's accuracy is directly dependent on the validity of the initial baseline evaluations, any understatement in those foundational assessments systematically translates into an understated cumulative impact. This flaw undermines confidence in the assessment’s conclusions and potentially obscures the real magnitude of environmental and socio-economic consequences

that may arise from the collective developments. It is imperative that the baseline assessments be rigorously revisited to ensure they accurately reflect the true conditions, thereby enabling a more robust and credible cumulative impact analysis. Without such rectification, the planning decisions informed by the current assessment risk being based on incomplete and misleading evidence.

The assessment finds that the proposal does not comply with key planning policies and environmental regulations concerning project splitting and the evaluation of cumulative effects. Specifically, it fails to meet the standards set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, the requirements of the Environmental Impact Assessment Regulations have not been satisfactorily addressed, resulting in an incomplete appraisal of the environmental implications.

It is evident that the applicant has not demonstrated a reliable identification and assessment of the cumulative and in-combination effects of the proposal. In particular, there is a lack of clarity regarding the overall impact of the project as a whole, with deferred works not having been adequately considered within the environmental evaluation. This omission undermines the integrity of the assessment and leaves a significant gap in understanding the full consequences of the development.

In conclusion, given these shortcomings, it is essential that the decision-making process explicitly addresses the treatment of the deferred works and ensures a comprehensive evaluation of cumulative effects is conducted. Without this, the proposal remains inconsistent with the relevant policy and regulatory framework, and approval would be premature. It is therefore requested that these matters be fully resolved before any determination is made.

1.1.528 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; however, this process has been fundamentally undermined by deficiencies in public participation that have persisted through to the application stage. The application consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is severely limited. In contrast, the applicant has had years, alongside substantial professional and financial resources, to prepare its case. The principles set out in GEN 18 of the National Marine Plan, alongside the requirements of effective public participation embodied in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage in decisions of this magnitude. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are respectfully urged to consider this shortfall carefully when weighing the representations made.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively.

For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.529 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the assessment predominantly considers Islay in terms of its potential role as a direct project location rather than as an affected island community in its own right. This approach overlooks the proximity of the development's Atlantic-facing edge to Islay's communities and neglects any place-based evaluation of the effects on their setting, economy, or community life within the 448 square kilometre development zone. Such an omission significantly undermines the reliability of the environmental and heritage impact evaluation, given the integral relationship between these communities and their maritime environment.

Colonsay and Oronsay are similarly impacted, with their daily life defined by a seaward outlook facing the development array directly. The North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is the focus of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. These gaps further call into question the thoroughness and accuracy of the applicant's evaluation of direct and significant effects on the heritage and environment of these islands.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment recognises significant effects on various parts of Mull and the Ross of Mull coastal communities, notably acknowledging high sensitivity in the Ross of Mull South coastal area at distances of approximately 22 to 24 kilometres with a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross. Importantly, Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—is identified as experiencing significant effects, reflecting its direct connection to visitor flows. Similarly, significant impacts are noted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as on the Loch na Keal National Scenic Area, which is of high sensitivity throughout a range of 21 to 33 kilometres, though the magnitude attributed does not exceed medium.

However, the applicant's methodology relies heavily on distance as a determinant of impact, as illustrated by the assessment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, exemplifying the distance-based reasoning that this objection challenges. This approach risks underestimating the true significance of visual and experiential effects on sensitive landscapes and communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

Moreover, the assessment does not adequately address the economic and community implications for Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers reliant on the integrity of the Atlantic

seascape. This seascape faces potential industrialisation from the proposed development, yet none of these coastal communities has been subject to a detailed, place-based evaluation. Without such focused consideration, the full extent of adverse effects on tourism-dependent economies and community cohesion remains insufficiently understood.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island

renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation has been applied in this objection, calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant's assessment cannot be regarded as comprehensive or sufficiently robust.

The applicant's assessment reveals a clear pattern: whenever a highly sensitive receptor is located beyond approximately 20 kilometres, the magnitude of change is systematically moderated and the resulting effect discounted. This approach effectively excludes comprehensive place-based evaluations for the communities experiencing these impacts. Such systematic moderation and discounting beyond this distance threshold lead to a consistent underestimation of significant effects on sensitive receptors. Consequently, the integrity of the environmental impact assessment is undermined, as the lived experiences and specific circumstances of affected communities beyond 20 kilometres are neither fully recognised nor adequately addressed.

1.1.530 Personal Observations

In addition to the planning matters above, I am personally concerned because: I strongly object to the proposed Machair offshore wind farm. I have a house on the north-west side of Islay, and the development would have a direct and lasting impact on the landscape and setting.

The Islay coast is defined by its open, undeveloped seascape, exceptional natural beauty and sense of remoteness. The introduction of a large number of industrial-scale turbines offshore would fundamentally alter that character, with significant visual impact from the surrounding coastline.

This is not simply a view enjoyed occasionally by visitors; it forms part of the locals everyday home and working environment. I am particularly concerned that insufficient weight is being given to the cumulative effect of such a large development on residents of north-west Islay and to the permanent loss of the island's distinctive wild and unspoilt coastal setting.

1.1.531 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant's own assessments acknowledge significant impacts on

nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. However, the published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and the identified effects on the island communities affected by the development have not been properly evaluated. Furthermore, the ecological considerations imposed by statutory tests have not been shown to be achievable. It is also pertinent to note that the submission before the Scottish Ministers represents only a portion of the overall project.

Given these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers consider an alternative course, I request that they require the provision of further environmental information, including improved visualisations, and that determination of the applications be deferred until after a public inquiry. Such an inquiry would allow for a thorough examination of the issues raised within this objection. Regardless of the decision ultimately reached, I further request that the Scottish Ministers explicitly address and record their conclusions on the impacts to cultural heritage and the affected island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 153
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (operating as ScottishPower Renewables), seek authorisation for an offshore wind development with an anticipated capacity of approximately 2 gigawatts. The scheme envisages the erection of between 91 and 144 turbines, each with a maximum tip height of 335 metres, situated within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

I request that my objection be formally recorded, that I am registered as an objector, and that I receive notification of the final determination on these applications.

The following outlines the planning and environmental grounds for my objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the responsibility to satisfy the relevant statutory tests rests solely with the applicant, who must provide adequate and convincing evidence to justify consent. Objectors are not obligated to disprove the proposals. Upon careful consideration of the evidence presented, it is clear that the applicant has not fulfilled this burden. Consequently, the applications should be refused consent.

1.1.532 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been proposed or will be implemented. Given these unresolved uncertainties and failures, the application conflicts with the applicable legal and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set out in

Scotland's National Marine Plan. The statutory framework requires that authorisation decisions align with the National Marine Plan unless relevant considerations indicate otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is an integral part of the statutory evaluation of the application.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence identifies deficiencies and omissions in the application's approach to co-existence with existing marine users, failing to satisfy the requirements of GEN 4. There is an absence of adequate assessment or mitigation measures addressing potential impacts on the historic environment, contrary to GEN 6 and the guidance in paragraphs 4.22 to 4.23. Similarly, the application does not sufficiently consider effects on landscape and national scenic areas as required by GEN 7 and paragraph 4.28, nor does it adequately address natural heritage concerns under GEN 9.

Furthermore, the application falls short in demonstrating effective engagement with stakeholders, a requirement under GEN 18, and does not provide sound evidence in accordance with GEN 19 and paragraph 4.81. The cumulative impacts of the proposal, which must be assessed under GEN 21 and paragraph 4.85, are not properly evaluated or mitigated. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these identified deficiencies, omissions, and conflicts, the application fails to meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies. As such, these matters weigh decisively against the granting of consent for the marine licence. The application should therefore be refused on the grounds of non-compliance with the statutory marine planning framework.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are engaged by this proposal. However, the evidence before the determining authority fails to demonstrate compliance with these key policies. There are clear deficiencies and omissions in the applicant's documentation that result in conflicts with the statutory duties and legislative requirements underpinning NPF4.

Specifically, the proposal does not provide sufficient evidence to satisfy Policy 3's requirements for biodiversity protection and enhancement. Similarly, the application lacks adequate assessment or mitigation measures to comply with Policy 4's objectives for safeguarding natural places. The historic environment considerations mandated by Policy 7 are not properly addressed, with no convincing demonstration that the proposal preserves or enhances historic assets and places. Furthermore, the submission falls short of meeting Policy 11's standards relating to energy, failing to show how the development aligns with national energy policies.

Given these unresolved deficiencies and the absence of demonstrated compliance, the proposal conflicts with the applicable legal and policy framework established by NPF4. As stated in the evidence, where compliance has not been demonstrated or where such conflicts exist, these matters weigh decisively against the granting of consent. Therefore, the application should be refused on the basis of its failure to meet the requirements of National Planning Framework 4 and its associated policies.

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The absence of a comprehensive and compliant Environmental Impact Assessment (EIA) in this case represents a critical procedural and substantive deficiency. Without this essential assessment, the decision-making authority is deprived of the necessary evidence to understand the full scope and scale of environmental consequences, thereby undermining the statutory framework designed to safeguard environmental interests. This failure to provide an adequate EIA is not a minor oversight but a fundamental breach of the statutory process, which must weigh decisively against the granting of consent.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which impose a clear duty to assess the effects of the development on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrable Habitats Regulations Assessment (HRA) or any evidence that these statutory tests have been properly applied constitutes a significant omission and legal non-compliance. Given the stringent protections afforded to European sites, any uncertainty or failure to demonstrate compliance with these regulations is a matter of serious concern. As established by the approved evidence, where compliance with the Habitats Regulations has not been demonstrated, or where deficiencies and omissions are evident, these factors must be regarded as material considerations against the proposal. In this instance, the lack of adequate assessment and failure to meet statutory obligations unequivocally justify refusal of consent.

The applicant’s submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence confirms that this statutory obligation is clear and unequivocal, establishing a legal framework within which proposals affecting island communities must be assessed.

In this case, the proposal fails to properly consider or weigh the interests of island communities as required by the Act. There are evident deficiencies and omissions in the applicant’s assessment, and no satisfactory demonstration that the statutory duty has been fulfilled. As the evidence states, where such compliance is not shown, or where conflicts with the applicable legal and policy framework arise, these matters must weigh against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not meet the statutory requirements of the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure means that the application does not meet the essential evidential burden necessary to satisfy the legal and policy frameworks governing the proposal.

As a direct consequence, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, undermines the legitimacy of the application. These shortcomings represent clear conflicts with the applicable legal and policy requirements that must be addressed before any consent can be considered.

In accordance with established principles, where compliance is not satisfactorily proven, such matters must weigh decisively against the granting of planning permission. Therefore, on the basis of the evidential failings presented, the application should be refused.

1.1.533 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposed development is that it fails to meet the impact criteria established in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy projects. Although NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with its specified impact criteria, including those concerning effects on communities, landscapes, seascapes, and other receptors. The proposal does not adhere to these requirements, resulting in significant adverse outcomes that cannot be justified within the policy framework.

More specifically, the proposal would cause substantial harm to nationally designated landscapes and seascapes, which are afforded particular protection under Policy 11(d) and 11(e). Furthermore, the submission fails to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The lack of evidence to safeguard the integrity of these heritage assets is a critical shortcoming. In addition, the proposal does not convincingly show that island communities, which Policy 11(c) seeks to protect, would be adequately safeguarded from detrimental impacts arising from the development.

Finally, the ecological considerations set out in the policy have not been satisfactorily addressed. The evidence submitted does not establish that the ecological tests can be met, leaving significant uncertainties regarding potential environmental harm. Taken together, these deficiencies mean that the proposal conflicts with NPF4 Policy 11's impact criteria in multiple respects. Consequently, it cannot be supported as compliant with the national planning framework's requirements for responsible and sustainable renewable energy development.

While some mitigation measures have been proposed, they fall short when assessed against the requirements of relevant NPF4 policies protecting designated assets. Policy 11 must be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on

their defining qualities, as well as Policy 7—particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) addressing the setting of historic assets—and Policy 3 on biodiversity. The evidence demonstrates that the proposal would result in significant adverse effects on these nationally designated landscapes and seascapes. Furthermore, it has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be effectively protected. Crucially, the ecological criteria set out in Policy 3 have not been proven capable of being met based on the submitted evidence. In summary, the proposal fails to comply with multiple interrelated NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity.

The proposal is found to be in conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This adverse impact demonstrates inconsistency with the development plan as a whole. Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy framework, and the applicant has not provided sufficient evidence to dispel this conclusion. Therefore, the proposal fails to accord with the relevant land-based policies and should be refused accordingly.

1.1.534 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a clearly defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant’s Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of receptor sensitivity or visibility extent. Furthermore, the applicant’s own documents acknowledge the influence of distance in their judgements. For example, a coastal area situated over 30 kilometres away is assessed as experiencing only a small scale of change due to the viewing distance. The Landscape Character synthesis delineates High magnitude effects within roughly 20 kilometres, Medium effects between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances corresponding to the locations of the most sensitive designated landscapes results in understated inputs to the protective assessments. Consequently, the conclusions drawn do not provide a reliable description of the effects on these landscapes, calling into question the adequacy of the evidence on which Scottish Ministers are being asked to base their consent decision.

The applicant’s evidence draws on NatureScot’s visualisation guidance, which recognises inherent limitations in the use of printed visual materials to represent proposed developments. Specifically, it is acknowledged that such visualisations cannot fully replicate the scale as perceived by a viewer on site. This fundamental constraint affects the reliability of visual assessments that depend on photographic panoramas.

Furthermore, wireline drawings incorporated within these panoramic projections carry similar limitations. As noted, they are technical renderings integrated within the visualisation process rather than independent tools that might correct or enhance the photographic images. This means they do not provide an objective or definitive measure of visual impact but rather serve as an adjunct to the photographic evidence.

Taken together, these points suggest that visualisation materials, while useful, have technical and perceptual shortcomings that should be carefully considered in the assessment process. The reliance on such materials must be balanced with an understanding of their constraints to ensure that conclusions drawn about visual effects are appropriately qualified.

The applicant’s evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, thereby permanently altering the character of the night-time seascape over its 35-year operational life. This change is not merely a temporal inconvenience; it represents a lasting transformation of the seascape’s intrinsic qualities. Furthermore, the policy implications of consenting to such development extend beyond the finite operational period. Granting permission would signify a formal recognition that this particular seascape is appropriate for wind farm use, thereby setting a precedent with potentially enduring consequences for the character and perception of the area at night. In summary, the introduction of lighting effects would cause a substantive and lasting impact on the night-time seascape, and the decision to approve would carry significant policy weight regarding the future use and character of this seascape.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant’s assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework’s objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be

reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.535 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets relies explicitly on the methodology recognised by Historic Environment Scotland, a framework developed and refined through consultation with that body. This methodology mandates a thorough evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, and critically, whether the integrity of that setting is adequately retained. It is made clear within the methodology that visual change alone should not be directly equated with adverse impact, thereby distinguishing between mere visibility and substantive harm to significance.

However, an independent Methodological Audit, produced in support of community objections and based solely on the applicant's own Appendix 14.3, identifies a serious deficiency in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in accordance with the applicant's accepted methodology. The assessment primarily describes visual change and then proceeds to conclude that the integrity of setting is adequately retained without presenting the crucial evaluative step required by the methodology. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the essential analytical process—connecting observed changes to their effect on cultural significance and setting integrity—is not evidenced in any of the worked examples examined by the Audit.

The applicant's assessment acknowledges the cultural significance of the heritage assets in question, identifying key qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. These attributes highlight the experiential nature of the site, where the relationships between monuments, spirituality, and the encompassing landscape and seascape are appreciated dynamically rather than from static viewpoints. However, the mitigation measures proposed appear to focus primarily on fixed viewpoints and physical preservation, which may insufficiently address the broader cultural and experiential qualities intrinsic to the heritage assets.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this concern by requesting additional viewpoints to better represent these wider cultural and landscape qualities. Their input suggests that the current assessment might not fully capture the intangible aspects of significance that are experienced through movement and interaction with the environment. This indicates a potential shortfall in the applicant's approach, where the nuanced understanding of the heritage context could be better integrated into the evaluation and mitigation strategy.

Balancing the necessity for development with heritage conservation demands a comprehensive appreciation of both tangible and intangible values. While the

applicant's baseline establishes the foundational cultural significance, the mitigation strategy would benefit from incorporating the wider experiential landscape qualities identified by Historic Environment Scotland. Doing so would ensure a more holistic preservation of the heritage's cultural significance, maintaining the integrity of the living cultural landscape that defines the site.

The heritage impact conclusions rely significantly on the landscape assessment, as established in the applicant's evidence. It has been demonstrated that where landscape effects have been understated, this understatement directly affects the reliability of the heritage conclusions that are founded upon them. Consequently, any deficiencies or minimisation within the landscape assessment inherently undermine the credibility of the heritage impact findings. This interdependency calls into question the robustness of the overall heritage evaluation presented.

The application fails to demonstrate adequate mitigation measures to protect heritage assets, falling short of the requirements set out in relevant policy. This matter engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage interests would be properly protected. This absence of demonstrable compliance with key heritage protection policies undermines the acceptability of the application.

1.1.536 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence underpins the local economy. These visitors are primarily attracted by the very qualities identified in the applicant's own baseline assessments: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Such attributes are not merely incidental but form the essential foundation of the visitor economy that sustains these communities.

Any alteration to these fundamental qualities would therefore have a direct and adverse impact on the economic base of the islands. This, in turn, threatens the viability of essential local services, the stability of resident populations, and the broader social sustainability of the communities themselves. The proposal, by jeopardising the key characteristics that draw visitors, risks undermining the long-term future of these island settlements.

The applicant's socio-economic assessment notably prioritises detailed analysis of port communities while neglecting a comparable place-based evaluation of the island communities directly facing the proposed development. Although their consultants recognised habitability as a potentially significant pathway for impacts on these islands, no subsequent assessment was undertaken to determine how the proposal might affect their habitability. This omission undermines confidence in the mitigation measures proposed, as these are predicated on an incomplete understanding of local sensitivities.

Island economies differ fundamentally from regional averages, being heavily concentrated in sectors that depend on the very qualities attracting visitors. Such reliance does not diminish their vulnerability; rather, it intensifies their exposure to any adverse changes. The applicant's conclusion that these communities exhibit low sensitivity to tourism effects, derived without specific place-based analysis, cannot be regarded as evidence-based but instead represents an unsubstantiated assumption. This calls into question the adequacy of the assessment's methodology and its capacity to inform appropriate mitigation.

Given these concerns, the socio-economic impacts on island communities require a more rigorous and locally focused evaluation. Without this, the assessment risks underestimating the true extent of potential harm and fails to provide a robust foundation for effective mitigation strategies. It is therefore essential that further, detailed place-specific analysis be undertaken to ensure that the unique vulnerabilities of island communities are properly understood and addressed.

The proposal fails to meet the required standards for assessing and protecting island communities, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, which necessitate decisions to be grounded in robust socio-economic evidence and to adopt a precautionary approach when such evidence is lacking. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite recognising the need for particular scrutiny of island communities, the applicant has not undertaken the necessary assessments to understand the potential effects of the proposal on these communities. The absence of such critical analysis means that the proposal's compatibility with sustainable island communities remains unsubstantiated. Consequently, the statutory duties owed to these communities have not been fulfilled or demonstrably discharged.

In conclusion, the proposal does not comply with the relevant planning policies or statutory requirements aimed at safeguarding island communities. Given this fundamental shortcoming, it is clear that the proposal cannot be supported as it stands, and it should be refused to ensure that the statutory and policy protections for island communities are upheld.

1.1.537 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over several decades. This large-scale intervention risks causing significant adverse effects due to the disturbance and potential damage to Priority Marine Features and Annex I habitats situated within the development area itself.

Moreover, the surrounding waters serve as important habitats for various protected species, including seabirds, marine mammals, and basking sharks. The presence of these species underscores the ecological value and vulnerability of the site, necessitating careful consideration of any impact arising from the project.

Given the established ecological importance and sensitivity of the location, it is imperative that any proposals fully account for the potential environmental consequences. Adequate safeguards and mitigation measures must be incorporated to prevent unacceptable harm to these priority habitats and protected species throughout the lifespan of the development.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant's decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant's own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has determined that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is imperative that no reasonable scientific doubt remains regarding the absence of adverse effects. This high evidential standard places the onus firmly on the applicant to demonstrate compliance; importantly, proposed mitigation, compensation measures, or future monitoring cannot, in isolation, substantiate that the statutory tests have been fulfilled. This legal framework is reinforced by the provisions of the Habitats Regulations, alongside GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Consequently, any planning consent must be underpinned by robust, conclusive evidence to satisfy these overlapping statutory and policy requirements.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.538 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it considers only part of the project before the Scottish Ministers, deferring critical components such as the export cable corridor and onshore transmission works to later applications. These deferred elements are essential for the wind farm's operation, yet their effects are never evaluated collectively with the principal development. This fragmented process prevents a comprehensive assessment of the project's cumulative impacts and contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than divided into smaller parts whose individual effects appear diminished. Such an incomplete evaluation undermines proper decision-making and fails to meet procedural and legal standards.

The assessment of cumulative effects within the Environmental Impact Assessment relies fundamentally on the baseline conditions established by preceding landscape, heritage, and socio-economic evaluations. However, these foundational assessments have been demonstrated to understate the true extent of impacts, leading to an initial baseline that is artificially diminished. Consequently, any cumulative impact analysis that builds upon this flawed baseline inherently inherits these inaccuracies, resulting in a systematic underestimation of the combined effects when the current proposal is considered alongside existing, consented, and foreseeable developments.

This methodological shortcoming undermines the reliability of the cumulative impact conclusions, as the starting point fails to reflect the genuine environmental and social context. The understated baseline reduces the perceived significance of incremental changes, thereby masking the full extent of potential harm. Without an accurate and robust baseline, the cumulative assessment cannot provide a dependable account of the total effects, which is critical for informed decision-making and effective mitigation planning. It follows that the current cumulative impact assessment cannot be regarded as sufficiently comprehensive or trustworthy in its present form.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project's total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.539 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant's extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

There remains significant uncertainty as to whether the environmental information provided is sufficient for the Scottish Ministers to make a fully informed decision on this application. Although the Environmental Impact Assessment (EIA) is extensive, its adequacy is questionable. The application identifies potential significant effects but fails to investigate them comprehensively or applies methodologies inconsistently. For example, the landscape assessment relies on distance-based outcomes not supported by its own methodology; the heritage assessment does not properly apply its stated integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals does not satisfy the EIA Regulations' requirement that likely significant effects must be understood before determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved later. On this basis, the applicant has not demonstrated that the environmental information submitted is adequate, and the application should not be approved in its present form.

1.1.540 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation primarily considers Islay in terms of its potential as a direct project location rather than as an affected island community in its own right. This approach overlooks the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area, without any place-based assessment of the impacts on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that is central to daily life directly faces the proposed array. Notably, the North Colonsay and Western Cliffs Special Protection Area forms Colonsay's coastline and is the focus of the applicant's derogation case and compensation plan, implicitly recognising that harm to the

internationally protected seabird population there cannot be ruled out. Furthermore, Oronsay Priory—a scheduled monument of national importance—lies within this community's area, yet the identified deficiencies in the heritage assessment equally apply to the evaluation of its open maritime setting. Taken together, these points demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment recognises that the Ross of Mull South coastal area is of High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of effect. It further accepts that significant effects would occur at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, which serves as the gateway to Iona and the embarkation point for visitors. This community is notably the most directly affected by visitor flows. Across Mull more generally, the applicant acknowledges significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity over distances of roughly 21 to 33 kilometres, but is nonetheless only attributed a Medium magnitude of effect.

However, the applicant's reliance on viewing distance to moderate the perceived scale of change is exemplified by the assessment of the Wilderness and Gribun Rocks coastal area, where the effect is judged small due to distances exceeding 30 kilometres. This distance-based reasoning fails to fully capture the nature of impact on distant but visually and culturally significant landscapes. Crucially, Mull's west-facing tourism economy, including its wildlife boat operations and accommodation sectors within western townships, depends heavily on the intactness of the Atlantic seascape. The development would effectively industrialise this seascape, yet none of these tourism-dependent communities has been subject to a place-based assessment.

Therefore, while the applicant acknowledges certain significant effects, the assessment underestimates the full extent of visual, economic, and community impacts on Mull and the Ross of Mull, particularly in relation to designated landscapes and the sustainability of tourism-dependent communities.

The applicant's assessment of the wider seaboard designated landscapes and island communities results in practical consequences that risk undermining the protection of their essential natural and cultural qualities. Notably, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing a critical phase of regeneration. This small, re-establishing community depends fundamentally on the unspoilt seascape and setting at stake, yet the applicant has failed to provide any assessment of the potential effects on Ulva. The absence of consideration for such a vulnerable community raises concerns about the adequacy of the overall evaluation and the safeguarding of the island's recovery prospects.

Further scrutiny reveals that other significant designated landscapes, despite their acknowledged sensitivities, are similarly underestimated. Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold advised by NatureScot for assessing National Scenic Area effects. The applicant nonetheless concludes that the scale of change on Staffa would be small and not significant, despite recognising its panoramic maritime qualities. Similarly, the Jura National Scenic Area, located around 28 to 32 kilometres away, is assigned High sensitivity but only Medium to Low magnitude of effect, justified by distance and retained landforms, even though its designation is founded on its wild, undeveloped Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives

comparable treatment. These assessments collectively suggest that significant effects on these important landscapes may be overlooked, thereby diminishing the protection of their distinctive character and the integrity of the island communities that rely on them.

The applicant's assessment that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape in question, thereby undermining the overall comprehensiveness of the evaluation. For instance, the island of Gigha, which holds national significance as a community-owned island symbolising island regeneration, faces the development waters from the east. The assessment neglects to examine how such effects could disrupt Gigha's finely balanced community and economy. Similarly, Ardnamurchan Point—the westernmost point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptor that the applicant's distance-based moderation approach discounts, which is inappropriate given their sensitivity and economic importance. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intimately tied to the open Atlantic seaboard that looks toward Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts sharing views toward the development site are similarly affected but remain unassessed. In sum, the omission of these receptors from the applicant's assessment results in a material gap that compromises its reliability and completeness, warranting further detailed consideration before any approval is granted.

The applicant's environmental impact assessment employs a distance-based mitigation approach that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the perceived magnitude of change experienced by these communities,

contrasting with the more detailed and place-specific assessments conducted within the 20-kilometre zone. By applying a generalized attenuation beyond this boundary, the assessment fails to acknowledge the true extent of potential impacts.

This approach results in a significant gap in the evaluation, as highly sensitive receptors beyond 20 kilometres receive no place-based assessment whatsoever. The consequence is that the lived experiences and environmental conditions of these distant communities are overlooked, undermining the integrity of the overall impact assessment. Such systematic underestimation raises concerns about the adequacy and completeness of the applicant’s methodology in capturing the full scope of environmental effects.

1.1.541 Personal Observations

In addition to the planning matters above, I am personally concerned because:
There's now an over supply of windfarms and off shore windfarms in the entirety of Scotland, but to place one here in this sensitive area is doubly abhorant.
Also too many other countries from Europe and further afield cashing in on Scotland's climate and land in developing clean energy, go elsewhere where man has already ruined the landscape

1.1.542 Further Comments

I've already stated my objections to the overuse of Scotland and it's environs being subjected too even more development for clean energy, enough , go to other less sensitive places already ruined by man!!

1.1.543 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. Moreover, independent scrutiny of the submitted documentation reveals that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the island communities were identified, they have never undergone a comprehensive appraisal. Additionally, the ecological criteria required to support the proposal have not been satisfactorily demonstrated as achievable. It is also notable that only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers contemplate approval, it is requested that they first mandate the submission of further environmental information and enhanced visual representations. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing for thorough examination of the concerns raised in this objection. Irrespective of the ultimate decision, it is also requested that

Ministers explicitly address and conclude on the proposal’s effects on cultural heritage and the island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 154
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386. These applications seek consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be officially recorded and that I be notified of the outcome of these applications.

The project envisages the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It involves the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The site lies within a Windfarm Development Area spanning around 448 square kilometres of sea to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona and in proximity to the islands and coastal communities of the southern Hebrides.

My opposition is grounded in planning and environmental considerations, assessed against the statutory and policy frameworks governing these applications. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating compliance with all relevant planning tests. The onus is not on objectors to prove the contrary. Having examined the evidence submitted, I conclude that the applicant has failed to meet this burden of proof and that consent ought to be refused.

1.1.544 Legislative and Policy Framework

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal’s environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met, as the evidence before the determining authority reveals deficiencies and omissions in addressing the specific needs and circumstances of island communities affected by the development.

The Islands (Scotland) Act 2018 explicitly requires that decision-makers take into account the unique social, economic, and environmental characteristics of island communities. However, the application lacks any substantive assessment or meaningful engagement that would satisfy this legal requirement. There is no clear evidence that the proposal has been evaluated in the context of its impact on island communities, nor that their interests have been adequately weighed against other considerations.

Where compliance with the Act has not been demonstrated, and where the evidence identifies such deficiencies and omissions, these matters must weigh against the granting of consent. The absence of a proper and thorough consideration of island community interests constitutes a material failure in the planning process and conflicts with the applicable legal and policy framework. Consequently, the proposal should be refused on this basis alone.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted evidence does not conclusively prove compliance with all applicable legal and policy frameworks. Furthermore, where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given these shortcomings, the application does not fulfill the necessary requirements to justify approval.

1.1.545 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant’s own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment’s conclusions fail to provide a reliable description of the effects the Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true visual effects. Given these constraints, decision-makers should consider the potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area's nocturnal character during the lifetime of the project.

Furthermore, it is important to recognise that the 35-year operational period does not mitigate the policy implications of this harm. A decision to consent to this development would effectively constitute an endorsement of the seascape's suitability for wind farm use, thereby accepting the associated changes to its night-time character. This acceptance carries enduring consequences beyond the temporal span of the project, as it sets a precedent for the permissible impact on the seascape in policy terms. Consequently, the introduction of night-time lighting should be carefully considered within the broader context of seascape character and planning policy to ensure that irreversible harm is not overlooked.

The proposal fails to demonstrate adequate mitigation when assessed against the requirements of key planning policies safeguarding landscape and seascape interests. Specifically, the applicant has not shown that its conclusions regarding the scale of the acknowledged effects align with its own assessment methodology. Consequently, there is no clear evidence that the proposal complies with the protections afforded to nationally important landscapes and seascapes. These shortcomings engage the provisions of National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Taken together, this indicates that the proposal does not meet the necessary policy standards intended to safeguard these valued environmental assets.

1.1.546 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, identifying key qualities such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape, it appears that the mitigation measures proposed may not fully address these dynamic experiential aspects. The applicant's baseline explicitly recognises that these values are experienced through movement rather than from fixed viewpoints, underscoring the importance of a broader cultural landscape perspective. Furthermore, Historic Environment Scotland, in their consultation responses recorded within the application, requested additional viewpoints to ensure that these wider qualities would be properly represented. This suggests that the current assessment and proposed mitigation may be insufficient in capturing the full extent of the heritage assets' cultural significance. Therefore, while some mitigation is offered, it falls short of encompassing the holistic and experiential qualities fundamental to the heritage assets, warranting further consideration to adequately protect their cultural value.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified

understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

The application fails to demonstrate compliance with crucial policy requirements designed to protect heritage assets of international and national importance, thereby undermining its acceptability. Specifically, it does not meet the standards set out in National Planning Framework 4 (NPF4), including Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of heritage sites, which the application must satisfy.

The applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. This absence of a thorough and credible assessment means the Scottish Ministers do not have before them the necessary information to conclude that the proposal aligns with the statutory and policy protections required. Without this demonstration, the application cannot be considered compliant with the relevant heritage protection policies.

Given these shortcomings, the proposal should be regarded as failing to meet essential policy tests for heritage asset protection. As such, it is respectfully submitted that the application should not be approved in its current form. Robust compliance with heritage policies is fundamental to ensuring that nationally and internationally significant cultural assets are preserved for future generations.

1.1.547 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands' economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

Any alterations to these defining characteristics would therefore have a profound impact, striking directly at the economic base upon which these communities depend. This, in turn, threatens the broader social sustainability of the islands by undermining essential services, diminishing population retention, and ultimately compromising their continuing viability. The proposal's potential to diminish the very qualities that attract visitors must be recognised as a fundamental risk to the long-term resilience of these island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant's own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission, the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors. The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

The proposal falls short in meeting the required planning and statutory standards for assessing and protecting island communities, particularly when measured against the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. In contrast to these requirements, the applicant has failed to undertake the necessary detailed assessment to understand the specific effects of the proposal on island communities.

This deficiency is not a mere procedural oversight but a substantive failure to demonstrate compatibility with the sustainability of island communities or to discharge the statutory duties owed to them. The applicant's recognition that island communities require particular scrutiny is not matched by the evidence or engagement provided. Without the appropriate assessment and meaningful consultation from inception to conclusion, the proposal cannot be deemed compliant with the statutory and policy framework designed to safeguard island communities. Consequently, the application should be regarded as non-compliant with essential planning policies and statutory duties.

1.1.548 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

The submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan represents a practical acknowledgement by the applicant that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. These documents are typically prepared to address situations where an adverse effect on the integrity of a protected site cannot be ruled out, indicating that the applicant has anticipated potential ecological impacts that require mitigation under the relevant derogation provisions.

Moreover, the inclusion of these documents as part of the application is a noteworthy aspect, as it reflects the applicant's understanding that the Scottish Ministers may reach a different conclusion regarding the presence or extent of adverse effects. This approach underscores the precautionary nature of the application process in relation to protected sites and suggests that the applicant is seeking to ensure that appropriate measures are considered to compensate for any potential harm. Nevertheless, the ultimate determination of whether these measures are adequate remains with the decision-making authority.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not in isolation satisfy the stringent evidential requirements set out under the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected habitat. This high evidential standard places the burden of proof firmly on the applicant, who must demonstrate conclusively that the statutory tests are met prior to consent being lawfully granted. Proposals reliant solely on mitigation or compensation without clear evidence of their effectiveness in preventing harm fail to meet these rigorous legal thresholds.

This legal framework is further reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e) and 4(f). Together, these policies underscore the imperative to prevent adverse effects on protected species and habitats, embedding the requirements of the Habitats Regulations into national planning policy. Consent decisions must therefore be aligned with these provisions, ensuring that no reasonable scientific doubt remains regarding the absence of adverse effects before development is permitted. This comprehensive approach safeguards environmental integrity while maintaining legal compliance.

The applicant's submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty regarding the potential impacts on these ecological features, undermining the applicant's position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.549 Cumulative and In-Combination Effects

The evidence demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to future applications. As these elements are essential for the wind farm's operation, their exclusion from the present assessment results in the whole project's effects never being considered collectively. This fragmented approach means that significant impacts will be evaluated in subsequent consenting processes, following the principal decision, rather than in a comprehensive manner at the outset.

Such a methodology is procedurally and legally unsound, as it conflicts with the established principle upheld by the courts in Raeshaw Farms. This principle mandates that a project must be assessed in its entirety and not subdivided into smaller parts that individually appear less significant. By salami-slicing the project, the current assessment fails to provide a complete understanding of its overall environmental and planning implications, undermining the integrity of the decision-making process. Consequently, the current approach should be reconsidered to ensure a holistic evaluation of the entire project.

The practical consequence of relying on the current cumulative impact assessment is that the true combined effects of the proposed development alongside existing, consented, and foreseeable projects are significantly underestimated. This has important implications for decision-makers who depend on accurate evaluations to fully understand potential environmental and socio-economic consequences. An understated baseline leads directly to an understated cumulative impact, which risks overlooking meaningful harm that may arise from the aggregate of developments in the area.

This problem arises because the cumulative assessments draw upon conclusions established elsewhere in the Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have already minimized or failed to fully capture the extent of effects, the cumulative assessment necessarily begins from this flawed baseline. As a result, the combined

effects are not properly accounted for, reducing the reliability of the overall assessment and weakening the evidential basis for planning decisions.

In light of this, the cumulative impact assessment cannot be considered a robust or trustworthy reflection of the likely combined effects of development in the locality. A more rigorous and comprehensive baseline evaluation is essential to ensure that cumulative assessments accurately reflect reality. Without this, the planning process risks proceeding on an incomplete understanding of potential impacts, which may lead to inadequate mitigation measures or inappropriate approval of proposals.

The applicant's submission fails to demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.550 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and planning application stages has demonstrably failed to meet the requisite standards for effective public participation. The applicant requests that Scottish Ministers attribute significant weight to the site-selection process; however, the deficiencies in public involvement at both the plan and site-selection phases have persisted into the application stage. Notably, the application documentation comprises many thousands of pages of technical material, presenting a substantial challenge for meaningful engagement. Moreover, the consultation period coincided with the busiest months for island communities, a time when residents are continuously occupied with the visitor season and access to specialist advice is at its lowest. This timing disparity is particularly significant given that the applicant has had years, along with substantial professional and financial resources, to prepare its case, contrasting sharply with the limited capacity of affected communities to respond effectively.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, explicitly require that those affected by decisions of this magnitude have a realistic and fair opportunity to engage. The conditions under which the local communities were expected to participate have fallen short of this standard, undermining the legitimacy and robustness of the consultation process. It is therefore essential that Ministers give careful and critical consideration to these shortcomings when evaluating the representations submitted, recognising that inadequate public participation has materially impacted the legitimacy of the site-selection and application processes.

The Environmental Impact Assessment (EIA) submitted as part of this application constitutes the primary evidential foundation upon which the Scottish Ministers must base their determination. However, it is imperative to note that the critical

consideration is not the extent or breadth of the EIA but rather its sufficiency in enabling a fully informed decision. Within the range of topics examined, the application identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. Notably, the landscape assessment presents conclusions that adhere to a distance-based pattern, yet this pattern is not supported by the methodology explicitly set out within the same assessment. Similarly, the heritage assessment does not adequately demonstrate that it has applied its own prescribed integrity test, thereby undermining the reliability of its findings. Furthermore, the socio-economic assessment lacks a focused, place-based analysis of the islands likely to be affected, which is a critical omission given the localised nature of socio-economic impacts in such contexts.

Moreover, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals is problematic. Such dependencies do not absolve the requirement, as stipulated by the EIA Regulations, that likely significant effects must be clearly understood prior to the determination of the application. The Scottish Ministers are obliged to make decisions based on the evidence before them at the time of determination, rather than on the presumption that outstanding issues will be adequately resolved at a later stage. In this case, the applicant has not demonstrated that the environmental information currently submitted meets the requisite standards of adequacy. Consequently, the information provided is insufficient to support a properly informed decision by the Scottish Ministers.

1.1.551 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands and their communities. Despite this geographical closeness, the applicant's assessment predominantly frames Islay solely as a potential project location, neglecting to evaluate its role as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay confront the nearest edge of the development area directly, yet no place-based appraisal has been undertaken to understand the implications for their local setting, economy, or community life. This omission significantly undermines the reliability of the environmental and heritage impact evaluation, as it fails to address the direct and tangible effects on the people and livelihoods of Islay.

Similarly, for Colonsay and Oronsay, the development's impact is intimately connected to the daily lived experience of these island communities, for whom the seaward outlook toward the array forms a defining element. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This acknowledgment highlights that harm to the internationally protected seabird population inhabiting these cliffs cannot be definitively ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Collectively, these deficiencies demonstrate that the application inadequately addresses the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay,

and Oronsay, calling into question the robustness and credibility of the overall environmental and heritage impact appraisal.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

While the applicant acknowledges significant visual effects at key locations such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort—the gateway to Iona and crucial to the visitor experience—their assessment attributes only medium magnitude effects despite recognising high sensitivity in these areas. This approach suggests a mitigation comparison that underestimates the true scale of impact on communities most directly tied to visitor flows. The acceptance of significant effects here contrasts with a seemingly inconsistent application of significance across other sensitive areas.

Further scrutiny reveals that although the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as the Loch na Keal National Scenic Area—an area of high sensitivity spanning approximately 21 to 33 kilometres—the effects are again limited to medium magnitude. This assessment appears to rely heavily on distance as a mitigating factor rather than fully accounting for the intrinsic value and interrelated character of these designated landscapes. For example, the treatment of the Wilderness and

Gribun Rocks coastal area, where changes at distances exceeding 30 kilometres are deemed small, exemplifies this distance-based reasoning that may downplay the project's visual and experiential consequences.

Moreover, the applicant’s assessment does not adequately address the broader economic and community impacts on Mull’s western coastal townships, whose tourism economy and wildlife boat operations are intimately connected to the Atlantic seascape that the development would industrialise. None of these communities has received a place-based assessment, leaving a significant gap in understanding how the project would affect livelihoods and landscape appreciation in areas dependent on the natural environment. In sum, the assessment underrepresents the cumulative visual, economic, and community impacts on Mull and the Ross of Mull, particularly regarding designated landscapes and tourism-reliant communities, warranting a more thorough and place-specific evaluation.

The applicant’s assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe’s most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island’s panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant’s assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, while attributing a Low magnitude of change to the proposed development. However, this evaluation appears to significantly understate the likely effects on Tiree’s landscape character. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, creating an open oceanic horizon that is both sensitive and distinctive. The introduction of turbines up to 335 metres in height would introduce vertical structures unprecedented in this seascape, thereby altering its defining characteristics in a manner not adequately reflected by a Low magnitude rating. Given the exposed nature of Tiree and the prominence such turbines would have

within its visual context, the conclusion of Low magnitude does not reliably represent the scale of change anticipated. Consequently, the assessment's evaluation of effects on Tiree's sensitive landscape is insufficiently robust and requires reconsideration to accurately reflect the magnitude of impact.

While the applicant's assessment includes certain mitigation measures aimed at moderating the visual and economic impacts of the proposed development, these measures fall short in adequately addressing the effects experienced by mainland and island communities with direct seascape connections to the site. The reliance on distance-based moderation fails to capture the nuanced and significant influence the development would have on receptors such as Ardnamurchan Point, where panoramic views along the Hebridean seaboard contribute substantially to local tourism. The application's approach thus inadequately accounts for the high-quality seaward panoramas that are central to the visitor experience and economic vitality of the peninsula.

Moreover, the assessment omits a thorough examination of communities on the west coast of Kintyre, whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard. These communities, alongside the Treshnish Isles and other small islands and mainland coasts facing towards the development, rely heavily on the visual and environmental integrity of these waters. The lack of consideration given to these receptors undermines the comprehensiveness of the assessment and risks overlooking cumulative impacts that may affect the sustainability of local economies and the preservation of community identity.

In addition, the omission of any evaluation of effects on Gigha, a community-owned island that stands as a national symbol of island regeneration, is particularly concerning. Gigha's eastern outlook towards the development area means that its finely balanced community and economy could be materially affected. The failure to include Gigha in the applicant's assessment represents a significant gap, limiting the understanding of the full range of consequences and thereby weakening the robustness of the environmental appraisal. Consequently, the assessment should be revisited to incorporate these critical receptors to ensure a more comprehensive and equitable evaluation of the proposed development's impacts.

The applicant's environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.552 Personal Observations

In addition to the planning matters above, I am personally concerned because: I live in Scotland, I am witnessing the ludicrous decision making that is allowing what I can

now only call, vandalism.
I call for a pause on all these renewable projects till we have a clear path and clear reasoning for what is being allowed to happen to the environment and communities all over Scotland.
Our communities and our natural capital should come first, not filling the pockets of foreign investors, blindly tick boxing so called green initiatives without proper scrutiny. The hypocrisy is palpable, destroying nature to save nature, wake up!

Based on my own local knowledge, I also wish to highlight that: We are fighting a depopulation issue in our vulnerable communities, us and our environment are wide open to exploitation. We need support not opposition from our government representatives, we need listened too.

Finally, I would also ask the Scottish Ministers to consider: They are allowing vurnerable, underfunded, overlooked communities to be exploited for greed. They are allowing the desecration of our environment and resources under a green guise which goes against their other so called renewable projects. We cannot destroy nature to save nature, the blatant vandalism that is the industrialisation of our stunning, world acclaimed environment is mind boggling.

1.1.553 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the necessary statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, independent reviews of the applicant's documentation reveal that these impacts have been consistently underestimated, and a comprehensive heritage assessment, as mandated, has not been undertaken. Furthermore, while the effects on the island communities concerned were identified, no assessment of these impacts has been conducted. The applicant has also not demonstrated that the ecological safeguards can be fulfilled. Crucially, the application submitted to the Scottish Ministers encompasses only a portion of the project, thereby lacking completeness.

Given these substantial shortcomings, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm and the related marine licence should be refused. Should the Scottish Ministers consider granting consent, it is requested that they require the provision of additional environmental information and enhanced visual representations. Moreover, determination of the applications should be deferred until after a public inquiry, allowing for a thorough examination of the issues raised by this objection. Regardless of the outcome, it is further urged that the Ministers explicitly address and record their conclusions on the impacts upon cultural heritage and the affected island communities within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 155
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.554 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence confirms that the applicant has not adequately addressed these requirements nor taken reasonable steps to mitigate adverse effects arising from the proposal on these protected interests. Furthermore, the Scottish Ministers, in determining this application, are mandated to have regard to the same statutory duties. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application's consideration of these statutory obligations, constitutes a clear conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to this determination, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and

paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating adherence to these policies undermines the statutory assessment process and indicates a failure to meet the necessary legal standards.

Furthermore, the application exhibits significant deficiencies and omissions in its evidence base, which preclude a proper evaluation of the potential impacts on the marine environment and associated interests. The lack of robust and sound evidence as required by GEN 19 and paragraph 4.81 is particularly concerning, as it impairs the ability of the determining authority to make an informed decision. Additionally, the application does not sufficiently engage with the cumulative impacts as mandated by GEN 21 and paragraph 4.85, nor does it demonstrate effective engagement with stakeholders in accordance with GEN 18. These shortcomings represent procedural defects and evidential gaps that conflict with the comprehensive and precautionary approach mandated by the National Marine Plan.

Given these material failures to comply with the applicable legal and policy framework, the application cannot be considered to meet the statutory requirements for marine licence determination. The identified conflicts and omissions weigh decisively against the granting of consent. In accordance with the Marine (Scotland) Act 2010 and the National Marine Plan policies, the application should be refused on the grounds that it does not satisfy the necessary criteria for authorisation.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are engaged by this proposal. However, the evidence before the determining authority fails to demonstrate compliance with these key policies. Specifically, there are deficiencies and omissions in the applicant’s evidence that result in conflicts with the statutory duties and legislative requirements underpinning NPF4.

Policy 3 requires the protection and enhancement of biodiversity, yet the proposal does not provide sufficient evidence to show that biodiversity interests will be maintained or improved. Similarly, under Policy 4, which safeguards natural places, the application lacks the necessary assessments or measures to ensure that natural habitats and landscapes will not be adversely affected. Policy 7 mandates the conservation of historic assets and places, but the applicant has not adequately addressed the potential impacts on heritage assets, leaving a critical gap in compliance. Finally, Policy 11 on energy demands that proposals contribute positively to energy objectives within the planning framework; the submission fails to demonstrate alignment with these requirements.

Given these unresolved deficiencies and the absence of demonstrated compliance with the relevant NPF4 policies, the proposal conflicts with the applicable legal and policy framework. As established by the applicant’s own evidence, such failures weigh decisively against the granting of planning consent. Therefore, on the basis of non-compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4, this application should be refused.

The proposal fails to comply with the statutory requirements for environmental assessment, as it does not provide an adequate Environmental Impact Assessment (EIA) in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. Without this essential information, the decision-making process is fundamentally compromised, preventing a lawful and informed consent.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in line with the applicable statutory tests. The absence of a compliant Habitats Regulations Assessment means that the potential impacts on designated habitats and species have not been properly evaluated, undermining the protection afforded by these regulations and contravening legal requirements.

Given these failures to demonstrate compliance with both the Environmental Impact Assessment and Habitats Regulations, and the presence of deficiencies and omissions in the submitted evidence, the proposal conflicts with the relevant legal and policy framework. As established, such shortcomings must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of inadequate environmental and habitats assessment.

The proposal under consideration fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself, and is a critical component of the legal and policy framework governing developments affecting island areas.

A detailed examination of the submitted documentation reveals significant deficiencies and omissions in how the proposal addresses these statutory requirements. There is no substantive evidence that the interests of the relevant island communities have been adequately identified, assessed, or incorporated into the planning rationale. The absence of such consideration constitutes a failure to meet the explicit duties imposed by the Islands (Scotland) Act 2018.

Furthermore, the lack of demonstrable compliance with this legislative requirement is not a minor procedural oversight but a fundamental flaw that directly conflicts with the applicable legal framework. As established by the Act and reinforced by planning policy, where compliance cannot be shown, or where evidence highlights such deficiencies, these factors must weigh against the granting of planning consent.

In conclusion, the proposal does not satisfy the statutory duty to consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018. This failure represents a material conflict with the legal and policy framework and accordingly constitutes a compelling reason to refuse consent.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental

assessment requirements through robust, objective, and proportionate evidence. The submitted documentation does not adequately satisfy the evidential burden necessary to confirm that every applicable legal and policy framework has been met. This failure is critical, as the absence of demonstrated compliance, coupled with identified deficiencies and omissions, directly conflicts with the statutory and policy obligations governing the proposal. In accordance with established principles, such unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's inability to provide the requisite evidence of compliance, the application should be refused.

1.1.555 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

Policy 11 must be considered alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Additionally, Policy 7, including section 7(h) concerning scheduled monuments and sections 7(c) and 7(d) relating to the settings of historic assets, as well as Policy 3 on biodiversity, provide a comprehensive framework for the protection of designated assets. The proposal, however, fails to align with these policies.

Specifically, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their recognised qualities. It has not been adequately demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor that the interests of island communities would be safeguarded. Furthermore, the ecological tests mandated by Policy 3 have not been shown to be met based on the evidence

submitted. Consequently, the proposal conflicts with the relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity.

The proposal fails to provide mitigation measures sufficient to overcome the adverse effects identified in the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. The same conflicts persist, notably the detrimental impact on landscape, heritage, and community interests that these policies seek to safeguard. As a result, the proposal is inconsistent with the relevant development plan framework and National Planning Framework 4 in its entirety, a position the applicant has not successfully contested.

1.1.556 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, which critically examines the applicant's Chapter 16 and related appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This inherent reliance on distance is further corroborated by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance. The Landscape Character synthesis likewise categorises magnitude of impact as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises serious concerns regarding the robustness of the assessment's conclusions. By attenuating the perceived magnitude of change precisely where the most important receptors lie, the protective tests applied are effectively based on understated inputs. Consequently, the outcomes presented do not reliably reflect the true effects that the Scottish Ministers are being asked to consent to, thereby undermining confidence in the assessment's capacity to safeguard sensitive landscapes adequately.

The practical consequence of relying on the visualisation materials provided is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations are unable to fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers reviewing the visual materials might underestimate or misinterpret the extent to which the development would be visible and affect the surrounding landscape.

Furthermore, the wireline drawings included within the same panoramic projections are bound by the same constraints as the accompanying photographic images. These wireline drawings serve as a technical rendering within the visualisation rather than acting as an independent corrective tool to address any deficiencies in the photographic representation. Consequently, these visual aids should be regarded

with caution, as they do not provide a definitive or fully reliable depiction of the visual effects. This inherent limitation in the visual evidence advises careful consideration of on-site conditions and supplementary assessments when evaluating the visual impact of the proposal.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a previously unlit sea horizon, which will permanently alter the character of the night-time seascape throughout the 35-year operational period. This change is significant because the current unlit condition contributes to the natural seascape character, and the presence of artificial lighting will inevitably diminish this quality for the duration of the wind farm's use.

From a policy perspective, the 35-year operational life does not mitigate the harm caused; rather, consenting to the development signals that the seascape is deemed appropriate for wind farm use despite the adverse impact on its night-time character. This decision sets a precedent for the acceptability of such alterations, which must be carefully weighed against the importance of conserving the seascape’s intrinsic qualities.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the adverse effects identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite acknowledging these impacts, the applicant has not demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. This lack of methodological consistency undermines confidence in the applicant’s findings and, crucially, fails to establish that the proposal meets the stringent policy tests intended to protect these significant natural assets. Consequently, the proposal does not accord with the relevant policies and should be refused on the basis of non-compliance with the statutory framework protecting landscape and seascape interests.

1.1.557 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment purports to follow Historic Environment Scotland’s established methodology for evaluating effects on the setting of historic assets, which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant’s Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required

by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant's conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.558 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by the proposed development rely exceptionally heavily on visitor numbers, with those visitors being attracted primarily by the very qualities identified as landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not peripheral to the local economy but form its core appeal; visitors seek out these distinctive characteristics, which define the islands' unique sense of place and underpin their tourism sector. This sector, in turn, sustains a wide range of local services, supports employment, and contributes directly to the social fabric and economic resilience of the communities. Any alteration or degradation of these qualities would therefore have a direct and deleterious impact on the fundamental economic base upon which the islands depend.

Given this intrinsic link, the proposal's potential to diminish landscape, seascape, cultural heritage, tranquillity or remoteness threatens not only the immediate visitor experience but also the longer-term viability of the islands as sustainable communities. A reduction in visitor appeal would likely precipitate a decline in tourism revenue, undermining local businesses and services that are vital to residents' quality of life. This, in turn, could lead to population decline as economic opportunities diminish and community viability is compromised. The evidence thus establishes a clear and significant risk that the proposal would impact adversely on the essential qualities attracting visitors and, through that pathway, imperil the economic and social sustainability of the island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a significant risk that the impacts on island communities will be misunderstood and inadequately mitigated. Despite the identification by the applicant's own consultants that habitability represents a potentially significant pathway affecting these communities, no specific assessment of habitability on the affected islands was undertaken. Instead, Chapter 18 confines its analysis largely to regional-level considerations, focusing on port communities in detail while neglecting a place-based assessment of the island communities directly facing the proposed development. This gap results in the unsupported conclusion that these island communities possess low sensitivity to tourism effects.

Such a conclusion is fundamentally flawed because small island economies differ substantially from regional averages. Their economic structures are concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies the risk to these communities by deepening their reliance on the very attributes potentially threatened by the proposal. Without a detailed, location-specific analysis, the assertion of low sensitivity amounts to an assumption, not an evidence-based finding.

In light of these points, the socio-economic assessment as presented fails to provide an adequate or reliable basis for understanding or mitigating impacts on island communities. Any decision-making premised on such an incomplete evaluation risks overlooking critical vulnerabilities, thereby undermining effective planning and protection of these sensitive island environments. It is essential that a thorough,

place-based socio-economic assessment be undertaken to properly inform the planning process.

The proposal fails to meet the required planning and statutory standards in relation to island communities, as it does not provide the necessary assessment or mitigation measures to address their specific socio-economic circumstances. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be carefully evaluated and afforded appropriate weight, supported by meaningful engagement throughout the planning process. In this context, the proposal's lack of comprehensive assessment undermines its compliance with these policy and statutory requirements.

Moreover, the applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary evaluation to understand the potential effects on them. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Consequently, the proposal falls short of the established legal and planning frameworks designed to protect island communities, rendering it unacceptable in its current form.

1.1.559 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application therefore signals the recognition by the applicant of potential harmful impacts, while also presenting proposed mitigation measures intended to address these concerns.

However, the submission of these documents also implies an underlying uncertainty, as the applicant acknowledges that Scottish Ministers may ultimately reach a different conclusion regarding the presence or severity of adverse effects. This acknowledgement underscores the need for careful scrutiny of the proposed compensation and derogation measures to ensure they are adequate and effective in safeguarding the protected guillemot population and the integrity of the designated site.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

This strict framework is set out in the Habitats Regulations and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). These collectively establish a high threshold for consent, ensuring that developments must meet rigorous environmental safeguards before approval can be lawfully granted. Consequently, planning decisions must be informed by robust scientific evidence to uphold these protections effectively.

The application before the authority has not demonstrated compliance with the statutory tests designed to protect internationally important habitats and species. This failure is evident from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty that these legal requirements can be met. As such, the risk of harm to protected ecological features remains unacceptably high.

It is essential to recognise that these statutory protections are in place precisely to safeguard internationally significant environmental assets. The applicant's inability to satisfy these tests undermines the fundamental purpose of these safeguards. Without clear and demonstrable evidence that the statutory criteria have been fulfilled, the justification for granting consent is significantly weakened.

In conclusion, the absence of robust assurance that the statutory tests have been met means the application cannot lawfully proceed. For these reasons, the proposal should be refused to ensure the continued protection of internationally important ecological interests.

1.1.560 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that the Scottish Ministers are only considering part of the project, while critical components such as the export cable corridor and the onshore transmission works have been deferred to future applications. Without these essential elements, the wind farm cannot operate, yet their effects are excluded from the present evaluation. This fragmentation results in a piecemeal assessment that fails to capture the full scope of the project's impacts.

Legally, this approach conflicts with established principles confirmed by the courts in Raeshaw Farms. The ruling emphasises that a project must be assessed in its entirety rather than being divided into smaller parts whose individual effects may appear less significant. By deferring key components for separate consenting

processes after the principal decision, the overall environmental and planning consequences remain inadequately examined at the critical decision-making stage.

In light of these considerations, the current method of splitting the project assessment undermines both legal requirements and sound planning practice. A comprehensive and integrated evaluation of all project elements is necessary to ensure that the full range of impacts is properly understood and addressed before any approvals are granted.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

There remains significant uncertainty regarding the applicant’s compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project’s total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.561 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty as to whether the consultation process associated with this application has met the essential standards of effective public participation. The applicant invites Scottish Ministers to place significant weight on the site-selection process, yet the deficiencies in public engagement observed at both the

plan and site-selection stages have persisted into the current application phase. Given that the application comprises many thousands of pages of technical material, the scale and complexity of the documentation have further complicated meaningful engagement.

Compounding this difficulty, the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is notably limited. This timing has inevitably constrained the ability of those affected to provide considered and informed responses. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources, thereby creating an imbalance in the consultation process.

Under GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is imperative that those affected by decisions of this magnitude are afforded a realistic opportunity to participate. The conditions under which the communities have been required to respond fall short of this benchmark. It is therefore respectfully urged that Ministers bear these concerns firmly in mind when considering the representations made, recognising the potential implications for the legitimacy of the site-selection process.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.562 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant’s assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the

impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—subject to the applicant's derogation case and compensation plan. This represents a clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, and attributes these effects a Medium magnitude. Specifically,

significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough

evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share

this position. The absence of targeted assessment for these locations undermines confidence in the applicant’s conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant’s environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.563 Personal Observations

In addition to the planning matters above, I am personally concerned because: Having carefully considered the points raised in the prior questions I feel that they cover the issues re.planning well enough. My personal point of objection would be this: Why do this, why proceed with a plan that will cause untold levels of distress and destruction to the ecology, society and culture of one of the extended area. This is not merely a planning application for a windfarm, it will have repercussions across Argyll and beyond. Where will the generated power go more development will be required across the mainland to bring it to the grid? Who is the power for? Scotland, I doubt it, it's for money isn't it, but money for Scotland? I doubt it. Scotland can already produce enough power for its own needs. This is industrial colonisation to strip Scotland's natural resources because the country is seen as an easy target because of low population density and this area is regarded as "remote"

1.1.564 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, published critiques of the applicant’s documentation indicate that the extent of these impacts has been understated. Crucially, the heritage assessment required by policy has not been completed. Furthermore, although adverse effects on the island communities affected by the development were identified, no formal evaluation of these impacts has been undertaken. The ecological requirements set out by statutory tests remain unproven as capable of being satisfied. Additionally, it is important to note that only a portion of the proposed project is currently before the Scottish Ministers for consideration.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, as well as to refuse the accompanying marine licence. Should the Ministers be inclined not to refuse outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I contend that the applications

ought to be determined only following a public inquiry, allowing for comprehensive examination of the issues raised in this objection. Whatever the outcome, I also ask that the Ministers explicitly address and provide clear conclusions within their decision regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 156
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, associated with application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the development of an offshore wind facility with a capacity of approximately 2 GW. The project envisions between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area encompassing around 448 square kilometres of marine space northwest of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded on planning and environmental considerations, assessed against the relevant statutory and policy frameworks governing such developments. It is important to recognise that the evidential burden lies firmly with the applicant, who must convincingly demonstrate compliance with all applicable tests and requirements. Opponents to the scheme, including myself, are not obliged to establish the contrary. Upon careful examination of the evidence presented, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

I request that this letter be formally registered as an objection and that I be informed of the final decision regarding these applications.

1.1.565 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is a systematic understatement of the potential effects on the most sensitive designated landscapes, which are often located beyond 20 kilometres from the development area. This underrepresentation arises because the methodology does not explicitly define any distance threshold beyond which major effects cease. Nevertheless, an independent Evidence Note, drawing solely on the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of its sensitivity or the extent of its visibility to the development.

Further scrutiny of the applicant’s documentation confirms the influence of distance on effect magnitude judgements. For instance, a coastal area more than 30 kilometres from the site is assessed as experiencing only a small scale of change due to the viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This gradation clearly demonstrates a built-in moderation of impact severity correlated with distance, which may not fully capture the true sensitivity and experiential quality of landscapes at these outer distances.

Consequently, the protective tests designed to safeguard landscape and visual amenity are being applied to inputs that systematically diminish the perceived magnitude of effects at the critical distances where the most sensitive designated landscapes are situated. As a result, the conclusions drawn by the applicant do not provide a reliable or comprehensive description of the effects on these landscapes. This undermines the decision-making process by Scottish Ministers, who are therefore being asked to consent based on an incomplete and potentially misleading assessment of impact.

While the visualisation materials submitted in support of the application follow NatureScot's established guidance, it is important to recognise their inherent limitations when compared to the actual experience of mitigation on site. Printed visualisations, including the wireline drawings incorporated within panoramic projections, are unable to replicate fully the scale and spatial relationships perceived by a viewer in the field. These technical renderings, rather than serving as independent corrections, function as components within the overall visualisation and therefore share its constraints in conveying an accurate sense of presence and impact.

This acknowledgement of technical and perceptual limitations suggests that reliance on such visual evidence alone may underrepresent the true extent of visual effects experienced locally. Consequently, a cautious approach is necessary when interpreting these materials, ensuring that any mitigation measures are evaluated not only through the lens of these visualisations but also through on-site assessments and other complementary forms of evidence. This balanced consideration will support a more robust understanding of the development's visual impact and the effectiveness of proposed mitigation.

While mitigation measures may address some visual impacts of the proposed development during daylight hours, they do not extend to the introduction of aviation and navigation lighting on a currently unlit sea horizon. This permanent alteration of the night-time seascape character would endure throughout the stated 35-year operational life, fundamentally changing an environment that presently experiences no such illumination.

Moreover, the temporal limitation of 35 years does not diminish the policy implications of consenting to this development. Approving the project effectively signals that the seascape in question is appropriate for wind farm use, setting a precedent that may influence future decisions and the long-term character of the area. Consequently, the impact of night-time lighting warrants careful consideration in the planning balance.

The applicant's submission fails to adequately demonstrate that proposed mitigation measures effectively address the identified effects on landscape and seascape interests. While certain impacts are acknowledged, the application does not provide sufficient evidence that these effects have been mitigated to a degree that would satisfy the requirements set out in the relevant policies. In particular, the assessment lacks clarity on how the scale of these effects aligns with the methodology employed, undermining confidence in the conclusions presented.

These shortcomings result in non-compliance with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the proposal does not meet the requirements of NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, as identified in the submitted evidence. Without clear demonstration of consistency and adherence to these policies, the proposal cannot be considered acceptable in its current form.

1.1.566 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a process developed through consultation with Historic Environment Scotland itself. This methodology mandates a careful evaluation of whether any changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, with particular attention to whether the integrity of setting is adequately retained. Importantly, it emphasises that visual change alone should not be equated directly with adverse impact. Despite this clear framework, the applicant's assessment fails to demonstrate compliance with these essential evaluative steps.

A Methodological Audit, undertaken in support of community objections and relying solely on the applicant's own Appendix 14.3, reveals that while the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been rigorously assessed in line with the accepted methodology. Instead, the assessment confines itself to describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then summarily concludes that the integrity of setting is adequately retained. This critical evaluative phase, which distinguishes the methodology, is absent from all examined examples. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is fundamentally undermined.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a range of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. However, Historic Environment Scotland, as recorded in the application's consultation responses, has identified that the assessment may not fully capture these broader experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its intangible values are properly represented. This suggests that the applicant's current assessment may inadequately reflect the holistic and lived experience of the heritage assets, which is critical to understanding their full cultural significance.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the same understatement. This creates a chain of understated impacts, whereby the significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

There remains significant uncertainty regarding the application's compliance with key heritage protection policies. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the settings of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for safeguarding the cultural significance of heritage assets and their surroundings.

Despite this policy context, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, the Scottish Ministers have not been provided with the requisite assessment to support such a conclusion. In light of this absence of essential evidence, the application cannot be considered acceptable in terms of heritage protection.

1.1.567 Effects on Island Communities, Tourism and the Local Economy

There remains significant uncertainty regarding the impact of the proposed development on the fundamental qualities that sustain the island communities concerned. These communities rely exceptionally heavily on visitors who are drawn specifically by attributes identified in the applicant's own baseline assessments, including the landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alterations to these intrinsic qualities would directly undermine the economic foundation upon which these island populations depend. This, in turn, threatens the provision of local services, the stability of resident populations, and ultimately the long-term viability of these communities. It is therefore essential to recognise that the proposal poses a substantial risk to the economic and social sustainability of the island settlements by jeopardising the very characteristics that attract and support their visitor economy.

The applicant's socio-economic assessment methodology falls short when compared to the detailed place-based analyses typically employed to understand and mitigate impacts on island communities. While the assessment in Chapter 18 provides a thorough examination of potential port communities, it neglects to apply an equivalent level of scrutiny to the island communities directly facing the development. Notably, the applicant's own consultants identified habitability as a

potentially significant pathway through which the proposal could affect these communities, yet no specific assessment of island habitability was undertaken. Despite this, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a finding that lacks the rigour of place-based evidence.

This conclusion fails to recognise that small island economies differ markedly from regional averages. Their economic structures are often concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Dependence on rising visitor numbers does not mitigate this vulnerability; rather, it intensifies the community's reliance on the very attributes that may be compromised by the development. Therefore, the assertion of low sensitivity, made without detailed, location-specific analysis, amounts to an unfounded assumption rather than an evidence-based judgment. Such methodological inadequacy undermines the reliability of the assessment and diminishes confidence in the adequacy of proposed mitigation measures for island communities.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal's effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal's compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system's requirements to safeguard island communities effectively.

1.1.568 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a scale of construction, operation, and decommissioning activity that would extend over several decades within an ecologically sensitive marine environment. Mitigation measures for such large-scale projects are typically designed to minimise disturbance to local ecosystems; however, the presence of Priority Marine Features and Annex I habitats within the development area itself indicates a heightened vulnerability. Surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks, all of which are species that require careful consideration due to their protected or conservation status.

Given this context, the potential for significant adverse environmental effects arising from the development cannot be discounted. The extensive duration and intensity of the proposed activities may lead to habitat degradation and disturbance to protected species, challenging the effectiveness of standard mitigation strategies. Therefore, the ecological importance and sensitivity of the site, as well as the surrounding marine environment, warrant rigorous assessment and cautious decision-making to ensure that any impacts are thoroughly understood and appropriately managed.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

Consent for developments that may affect protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement, established under the Habitats Regulations, imposes a rigorous evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. Consequently, the applicant bears the full burden of proof to satisfy this high threshold.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies underscore the necessity for stringent assessment and caution in decision-making concerning developments impacting protected natural assets, ensuring that environmental safeguards are paramount.

It is important to note that mitigation strategies, compensation measures, or proposals for future monitoring cannot, in isolation, fulfill the statutory tests required under the Habitats Regulations. Only where these rigorous conditions are met without reasonable scientific doubt may consent be lawfully granted. This framework ensures that protection of habitats and species is not compromised by speculative or insufficiently evidenced development proposals.

The applicant's submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty regarding the potential impacts on these ecological features, undermining the applicant's position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are

fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.569 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts might appear less significant. By effectively "salami-slicing" the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project's true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposal, alongside other existing, consented, and foreseeable developments, are underestimated. This arises because these cumulative assessments depend directly on conclusions drawn in other parts of the Environmental Impact Assessment. If the baseline assessments for landscape, heritage, and socio-economic factors are understated, as previously outlined, then the cumulative assessment is inherently flawed by starting from this diminished baseline. As a result, the overall impact is not fully captured, calling into question the reliability of the cumulative impact conclusions.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and

paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.570 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty surrounding the adequacy of public participation in the site-selection process, which the applicant urges the Scottish Ministers to weigh heavily. The quality of engagement at both the plan and site-selection stages exhibits notable deficiencies that have persisted into the current application phase. Given the extensive volume of technical documentation—comprising many thousands of pages—and the timing of the consultation during the island communities' busiest months, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited, the opportunity for meaningful participation has been severely constrained. This contrasts starkly with the applicant's prolonged preparation period and substantial professional and financial resources.

The importance of effective public participation in decisions of this scale is underscored by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention. These require that those affected are afforded a realistic opportunity to contribute to the decision-making process. Unfortunately, the circumstances under which the local communities have been expected to respond fall short of these established standards.

In light of these concerns, it is essential that the Scottish Ministers give careful consideration to the limitations of the consultation process when evaluating the representations submitted. The legitimacy of the site-selection process depends significantly on ensuring that public participation is both meaningful and accessible, and this has not been demonstrably achieved in the present case.

The Environmental Impact Assessment submitted with this application fails to provide sufficiently robust evidence to enable the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across various topics, it does not investigate these impacts comprehensively. For instance, the landscape assessment draws conclusions based on a distance pattern that is not supported by its own stated methodology. Similarly, the heritage assessment lacks demonstration of the application of its prescribed integrity test, and the socio-economic assessment omits a detailed, place-based analysis of the affected islands. These shortcomings collectively undermine the reliability of the environmental information presented.

Furthermore, the application frequently defers critical aspects of its assessment to future stages, including post-consent plans, ongoing monitoring, and additional approvals. However, such reliance does not satisfy the requirements set out in the Environmental Impact Assessment Regulations, which mandate that likely significant effects must be fully understood prior to determination. The practice of postponing

essential evaluations to a later date is inconsistent with the statutory framework intended to ensure comprehensive environmental consideration at the decision-making stage.

In conclusion, the Scottish Ministers are obliged to base their determination on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed in the future. Given the deficiencies identified, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards. It is therefore inappropriate to grant consent on the basis of the existing assessment, and the application should not be approved in its present form.

1.1.571 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and importance of the visual and community impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with extensive visibility and a moderate but significant overall effect extending approximately 21 kilometres, where turbines span around 39 degrees of the horizon. Similarly, the West Coast of Iona, including its highest point at Dùn Ì, is acknowledged as highly sensitive with widespread visibility, and the applicant accepts significant effects for residents and visitors. Despite this, the assessment fails to fully address the community's concerns and the implications for habitability, a pathway of impact recognised by the applicant's own consultants but never properly examined.

Iona's heritage assets, notably its internationally important monastic landscape comprising the Abbey, the Nunnery, and the high crosses, are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission compromises the accuracy of the heritage impact assessment and fails to reflect the true extent to which the development would affect the island's cultural significance and visitor experience.

The practical implications of the visual scale are stark when compared to familiar landmarks. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at about 33 kilometres, would be dwarfed by the proposed turbines, which would exceed it in height by approximately 194 metres at roughly two-thirds of the distance. This comparison underscores the overwhelming presence the turbines would have on the island's landscape and the lived experience of its community. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting the depth of local opposition and reinforcing that the assessment's conclusions do not reflect the community's perspective or the development's true impact.

The applicant's assessment recognises significant effects on several key areas of Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with a Medium magnitude of impact attributed. The assessment acknowledges significant effects at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the community serving as the gateway to Iona and the primary point of embarkation for visitors. This community is explicitly noted as being most directly linked to the flow of visitors, whose experience the applicant concedes would be significantly affected. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout, at viewing distances between approximately 21 and 33 kilometres, yet only a Medium magnitude of impact is attributed. This suggests an underestimation of potential visual and experiential effects in sensitive, designated landscapes.

A further concern arises from the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the assessment relies heavily on distance-based reasoning, concluding that due to viewing distances exceeding 30 kilometres, the scale of change is small. Such reasoning fails to fully account for the qualitative importance of these landscapes and their coastal character to the local communities and tourism economy. Mull's west-facing tourism sector, including wildlife boat operators and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessment has been undertaken for these communities, leaving a significant gap in understanding the cumulative visual, economic, and community impacts. This omission undermines the robustness of the applicant's conclusions and suggests the need for a more

comprehensive and locally attuned evaluation of effects on Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the

development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape where the development is proposed. This omission has practical consequences for the accuracy and completeness of the environmental evaluation, as these communities represent key receptors whose social and economic well-being is closely intertwined with the quality and character of the surrounding marine environment. Without their inclusion, the assessment cannot be regarded as comprehensive or fully informed.

Among the communities overlooked is Gigha, a community-owned island of national significance due to its residents' purchase, which symbolises island regeneration. Gigha faces the development site from the east, yet the effects on its finely balanced community and economy have not been examined. This is a notable omission given the island's unique status and the potential sensitivity of its social and economic fabric to changes in seascape character. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—commands panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach should apply, but it has been disregarded.

Further, the west coast of Kintyre comprises a chain of communities whose outlook, character and visitor economy are defined by the open Atlantic seaboard looking towards Islay, Jura, and the wider waters beyond. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. The failure to assess impacts on these interconnected communities undermines the robustness of the environmental appraisal and risks neglecting the socio-economic repercussions of the proposal. It is essential that the assessment be revisited to address these gaps, ensuring all relevant receptors are properly considered.

The environmental impact assessment submitted by the applicant employs a distance-based approach that systematically moderates the magnitude of change and discounts effects on highly sensitive receptors beyond approximately 20 kilometres. This methodology results in a significant underestimation of the true impacts experienced by these receptors. It is clear from the evidence that such an approach fails to adequately capture the extent and severity of effects at greater distances, thereby compromising the assessment's overall integrity.

Furthermore, the communities residing beyond this 20-kilometre threshold have been effectively excluded from any meaningful place-based assessment. This omission is of particular concern as it disregards the lived experiences and sensitivities of those populations who may be substantially affected. The absence of detailed, location-specific evaluation for these receptors undermines the

comprehensiveness and robustness that is essential for a credible environmental impact appraisal.

In conclusion, the applicant's distance-based moderation and discounting approach beyond 20 kilometres cannot be accepted as a reliable or thorough method of assessment. To ensure the environmental impact assessment accurately reflects the full range of effects, a more rigorous, inclusive, and place-sensitive evaluation is necessary. Without such improvements, the current assessment remains fundamentally flawed and insufficiently protective of sensitive receptors situated beyond the arbitrary 20-kilometre boundary.

1.1.572 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, published evaluations of the applicant's documentation reveal that the extent of these impacts has been underestimated and that a comprehensive heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently submitted to the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. I also propose that the determination of the applications be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask the Ministers to provide clear and explicit conclusions concerning the impacts on cultural heritage and on the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 157
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.573 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in NPF4 Policy 11, thereby calling into question the extent of its support for renewable energy development. NPF4 Policy 11 endorses such development only insofar as it meets specific impact tests, including those relating to communities under Policy 11(c), and to landscape, seascape, and other receptors under Policies 11(d) and 11(e). A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been sufficiently demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. In addition, the evidence submitted fails to confirm that the necessary ecological tests can be met. On this basis, the proposal conflicts with the impact criteria of NPF4 Policy 11 and thus does not benefit from its intended policy support.

In considering the proposal’s compliance with the National Planning Framework 4 (NPF4), it is important first to weigh the mitigation measures against the stringent protections afforded by relevant policies. Policy 11 operates in conjunction with Policies 4(c) and 4(d), which collectively safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects. Despite these protections, the proposal fails to demonstrate effective mitigation that would prevent

substantial harm to the qualities for which these areas are designated, thereby falling short of the rigorous standards set by NPF4.

Furthermore, the proposal raises concerns regarding the protection of designated heritage assets under Policy 7, including Policy 7(h) which specifically addresses scheduled monuments, along with Policies 7(c) and 7(d) that relate to the settings of historic assets. The evidence submitted does not convincingly establish that the cultural significance of these monuments and their contexts would be preserved. This lack of demonstrable safeguarding undermines the policy's intent to maintain the historic environment's integrity, further highlighting the proposal's shortcomings in this respect.

Lastly, the proposal does not satisfy the requirements of Policy 3 on biodiversity, nor does it adequately show that island communities would be protected as mandated. The ecological assessments provided are insufficient to confirm that the necessary ecological tests can be met, leaving considerable uncertainty regarding the potential environmental impacts. Taken together, these factors reveal a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, indicating that the proposal does not accord with the framework's comprehensive safeguarding objectives.

When considering the terrestrial development plan framework relevant to land-based effects, it is evident that the proposal fails to provide adequate mitigation to address the adverse impacts identified. Specifically, the Argyll and Bute Local Development Plan 2 seeks to protect landscape, heritage, and community interests, yet the proposal would result in significant harm to these valued aspects. The measures put forward do not sufficiently counterbalance the detrimental effects, leading to a clear inconsistency with the plan's protective aims.

This conflict with the Argyll and Bute Local Development Plan 2 extends beyond local policy to encompass the broader National Planning Framework 4 when read in its entirety. The applicant has not demonstrated how the proposal aligns with the development plan framework or overcomes the identified conflicts. Consequently, the proposal stands in opposition to the established terrestrial planning policies designed to safeguard land-based interests, and this inconsistency should weigh heavily against its approval.

1.1.574 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape for the duration of its 35-year operational life. Importantly, this operational timeframe does not mitigate the policy harm, as granting consent would effectively signify that the seascape is deemed suitable for wind farm use. This fundamental change to the night-time environment raises significant considerations in relation to the impact of lighting on seascape character and its policy implications.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4

Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.575 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment methodology as applied to the evaluation of heritage impacts in this case. While the applicant states that they have adopted Historic Environment Scotland's recognised approach for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—closer examination reveals shortcomings in its application. This established methodology requires a thorough evaluation not merely of visual changes, but specifically whether such changes affect the contribution that the setting makes to the cultural significance of the heritage asset, including an assessment of whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly advises against equating visual change directly with adverse impact.

However, a published Methodological Audit, prepared independently in support of community objections and relying solely on the applicant's own Appendix 14.3, identifies a critical gap. While the assessment comprehensively describes visual changes—addressing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's accepted methodology. The key evaluative step, which would link these visual changes to any effect on the setting's integrity, is absent in all the worked examples examined by the Audit. Consequently, the conclusions drawn about the integrity of the setting being adequately retained rest on an incomplete and insufficiently substantiated analysis.

In summary, the applicant's assessment does not fully comply with the required methodology, casting doubt on the reliability of its conclusions regarding heritage impacts. This deficiency undermines confidence that the cultural significance and integrity of historic assets have been properly safeguarded.

The applicant's assessment risks underrepresenting the true cultural significance of the heritage assets by focusing predominantly on fixed viewpoints rather than the broader experiential qualities integral to their value. Their own baseline acknowledges that the significance arises from a combination of factors including pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These elements are inherently experienced dynamically, through movement, rather than from static observation points. Historic Environment Scotland has highlighted this limitation in their consultation responses recorded within the application, specifically requesting additional viewpoints to ensure these wider qualities are adequately captured. Without fully addressing these experiential and relational aspects, the assessment may fail to reflect the heritage assets' cultural significance in a comprehensive manner. Consequently, it is essential that the assessment methodology is expanded to incorporate these broader landscape and movement-based experiences to provide a more accurate and meaningful evaluation of heritage impacts.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the stringent requirements set out in NPF4 Policy 7(h) regarding scheduled monuments, and Policies 7(c) and 7(d) concerning their setting, the applicant's submission does not provide the necessary assessment or evidence to confirm that these assets will be safeguarded in accordance with these policies. Similarly, the requirements of GEN 6 and the guidance in paragraphs 4.22 to 4.23 of the National Marine Plan are not sufficiently addressed, leaving a significant gap in the protection framework that these policies and plans seek to establish.

Furthermore, the absence of a robust heritage impact assessment means that the Scottish Ministers are not in possession of the information needed to conclude that the proposal complies with the relevant heritage protection policies. Without this critical appraisal, the application cannot be considered to meet the policy tests designed to ensure the conservation of heritage assets. This deficiency undermines the acceptability of the proposal, as it fails to provide the assurances required by national planning policy and marine planning guidance for the protection of heritage interests.

1.1.576 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

The applicant's socio-economic assessment fails to provide an adequate basis for mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

1.1.577 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support notable populations of seabirds, marine mammals, and basking sharks. The proposed project would bring construction, operational, and decommissioning activities on a very large scale, extending over several decades, thereby introducing sustained pressures on these ecologically sensitive environments.

Given the recognised ecological importance and sensitivity of the site and its adjacent marine habitats, the potential for significant adverse environmental effects from the development is substantial. The presence of protected species and priority features necessitates careful consideration of the impacts that such large-scale and long-term activities may impose on biodiversity and habitat integrity.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The

inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant's approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant's recognition of ecological sensitivities and the need for compensatory measures.

1.1.578 Effects on Local Area

The applicant's assessment significantly underestimates the scale and importance of the visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the development area and extensive visibility. It describes a large geographical extent of change, with effects on the ferry crossing between Fionnphort and Iona, and an overall effect rated as Moderate and Significant. This impact extends approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's own baseline recognises this significance as closely tied to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage context. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite habitability being identified by the applicant's consultants as a potential pathway of effect on the community, it was not assessed in the submitted documentation.

The perceived scale of the turbines can be further appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines proposed would exceed Ben Hynish's height by approximately 194 metres, despite being located at roughly two-thirds of that distance, emphasising their imposing presence. In light of these quantified impacts and the significant omissions in assessment, the full extent of the proposal's effects on Iona must be reconsidered.

The applicant's assessment notably relies on distance-based mitigation in addressing the visual impacts on Mull and Ross of Mull coastal communities and landscapes, yet this approach inadequately reflects the true extent of significant effects experienced locally. For instance, although the Ross of Mull South coastal area is acknowledged as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed Medium magnitude effects, the applicant concedes significant impacts at Erraid, on the Core Paths of the Ross, and at Fionnphort—the key gateway to Iona and the principal embarkation point for visitors. This community

is intrinsically linked to visitor flows, yet the assessment does not extend to a place-based evaluation of its social and economic vulnerabilities. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area, and the Loch na Keal National Scenic Area, which is of High sensitivity between 21 and 33 kilometres, is nonetheless attributed no more than Medium magnitude. The applicant's characterisation of the Wilderness and Gribun Rocks area, where the scale of change is deemed small due to viewing distances exceeding 30 kilometres, further exemplifies an over-reliance on distance as a mitigating factor rather than a nuanced, site-specific analysis.

This distance-centric assessment framework fails to capture the profound implications for Mull's west-facing tourism economy, which is heavily reliant on the unspoiled Atlantic seascape that the proposed development would fundamentally industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately connected to this landscape quality, yet no dedicated place-based assessments have been conducted for these communities. The absence of such evaluations undermines the understanding of the cumulative and localized economic and community impacts that would arise. In summary, the applicant's assessment inadequately accounts for the significance of visual, economic, and community effects on highly sensitive landscapes and tourism-dependent populations, thereby failing to provide a comprehensive or balanced appraisal of the proposal's true consequences for Mull and Ross of Mull.

The applicant's assessment fails to fully recognise the significant effects on designated landscapes and island communities, thereby risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is entirely subject to the same impacts identified for that landscape. As a small, re-establishing community reliant on its unspoilt seascape and setting for regeneration, the absence of any specific assessment for Ulva is a notable omission. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies some 35 kilometres from the development area—beyond the 30-kilometre assessment limit advised by NatureScot. Despite acknowledging its panoramic maritime qualities, the applicant concludes effects there would be small and not significant, a judgement that understates potential impacts. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic character, is assessed at a distance of around 28 to 32 kilometres with an assumed Medium to Low magnitude of effect based on distance and retained landforms; this moderation contrasts with the importance of its designation. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment approach. Collectively, these considerations suggest the applicant's evaluation underestimates or omits significant effects, undermining the proper protection of these sensitive seaboard landscapes and vulnerable island communities.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. Notably, Gigha, a community-owned island renowned as a national symbol of island regeneration following its purchase by residents, faces the development from the east; yet, the impacts on its delicate community balance and economy remain unexamined. Similarly, Ardnamurchan

Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach is incorrectly applied, thereby undermining an accurate assessment. Furthermore, the chain of communities along the west coast of Kintyre derives its character and visitor economy from the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts overlooking the development area share this position of sensitivity. In neglecting these viewpoints and their associated economic and community significance, the applicant's assessment lacks the necessary comprehensiveness and fails to address key receptors integral to the seascape's social and economic fabric.

1.1.579 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant's documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 158
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications seek approval under section 36 of the Electricity Act 1989 and for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010 respectively. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres of sea. The site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in proximity to the islands and coastal communities of the southern Hebrides.

I request that this letter be registered as a formal objection and that I am notified of the final decision regarding these applications. The grounds for my objection are rooted in both planning and environmental considerations, which I outline below with reference to the statutory and policy framework applicable to the determination of these proposals.

It is important to emphasise that the statutory responsibility to demonstrate compliance with the relevant planning and environmental tests rests entirely with the applicant. Adequate and compelling evidence must be provided by MachairWind Limited to satisfy these requirements. Objectors, including myself, are not obliged to prove the contrary. Upon careful assessment, the applicant has failed to discharge this burden. Consequently, for the reasons articulated in the following sections, the applications do not meet the necessary tests, and consent ought to be refused.

1.1.580 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposed development is that it fails to meet the impact criteria established in NPF4 Policy 11, thereby undermining the policy’s intended support for renewable energy projects. Although NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with its specified impact criteria, including those concerning effects on communities, landscapes, seascapes, and other receptors. The proposal does not adhere to these requirements, resulting in significant adverse outcomes that cannot be justified within the policy framework.

More specifically, the proposal would cause substantial harm to nationally designated landscapes and seascapes, which are afforded particular protection under Policy 11(d) and 11(e). Furthermore, the submission fails to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The lack of evidence to safeguard the integrity of these heritage assets is a critical shortcoming. In addition, the proposal does not convincingly show that island communities, which Policy 11(c) seeks to protect, would be adequately safeguarded from detrimental impacts arising from the development.

Finally, the ecological considerations set out in the policy have not been satisfactorily addressed. The evidence submitted does not establish that the ecological tests can be met, leaving significant uncertainties regarding potential environmental harm. Taken together, these deficiencies mean that the proposal conflicts with NPF4 Policy 11's impact criteria in multiple respects. Consequently, it cannot be supported as compliant with the national planning framework's requirements for responsible and sustainable renewable energy development.

Policy 11 must be considered alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Additionally, Policy 7, including section 7(h) concerning scheduled monuments and sections 7(c) and 7(d) relating to the settings of historic assets, as well as Policy 3 on biodiversity, provide a comprehensive framework for the protection of designated assets. The proposal, however, fails to align with these policies.

Specifically, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their recognised qualities. It has not been adequately demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor that the interests of island communities would be safeguarded. Furthermore, the ecological tests mandated by Policy 3 have not been shown to be met based on the evidence submitted. Consequently, the proposal conflicts with the relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity.

1.1.581 Seascape, Landscape and Visual Effects

The proposal fails to demonstrate adequate mitigation in comparison to the requirements set out in relevant planning policies protecting landscape and seascape interests. The applicant has not shown that its assessment of the scale of the accepted effects aligns with its own methodology, thereby undermining the reliability of its conclusions. As a result, the proposal does not comply with National Planning Framework 4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), or GEN 7, nor does it meet the standards outlined in paragraph 4.28 of the National Marine Plan. This shortfall indicates a failure to safeguard nationally important landscapes and seascapes as mandated by these policies. Consequently, the proposal does not accord with the necessary policy framework and should not be supported.

1.1.582 Effects on Island Communities, Tourism and the Local Economy

Although mitigation measures are proposed, they fail to adequately address the fundamental threat posed by the development to the qualities that underpin the island communities' economies. These communities rely exceptionally heavily on visitors who are drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness—qualities identified in the applicant's own baseline assessments. Any alteration to these attributes directly undermines the economic foundations of these islands, which in turn jeopardises local services, population stability and the long-term viability of the communities themselves. Consequently, the proposal represents a significant risk to the essential economic and social sustainability of the island populations.

1.1.583 Cumulative and In-Combination Effects

The applicant’s submission fails to demonstrate compliance with key planning policies and regulatory requirements relating to project splitting and the assessment of cumulative effects. Specifically, the evidence engages GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations, all of which mandate comprehensive evaluation of cumulative and in-combination effects. The applicant has not reliably identified or assessed these effects for the proposal in its entirety, leaving a significant gap in the environmental appraisal.

Furthermore, the treatment of deferred works remains unaddressed, raising concerns about the completeness and transparency of the decision-making process. It is therefore requested that the decision expressly considers these deferred elements to ensure full regulatory compliance and informed planning outcomes. Without such explicit consideration, the proposal cannot be deemed to meet the necessary policy and environmental standards.

1.1.584 Effects on Local Area

The applicant’s mitigation and compensation proposals, while addressing certain ecological concerns such as those related to the North Colonsay and Western Cliffs Special Protection Area, fall short of adequately accounting for the broader and more direct impacts on the communities of Islay, Colonsay, and Oronsay. The derogation case and compensation plan acknowledge potential harm to the internationally protected seabird populations along Colonsay’s coastline, yet this represents the only clear recognition of significant adverse effects. By focusing predominantly on ecological mitigation, the application fails to extend similar rigour to the assessment of social, economic, and cultural impacts, leaving these factors insufficiently considered and underrepresented.

This underassessment is particularly evident in the treatment of Islay, Colonsay, and Oronsay as affected communities. Islay’s Atlantic-facing settlements, situated immediately adjacent to the 448 square kilometre development area, receive minimal place-based evaluation of how their setting, economy, or community life might be altered by the proposals. Similarly, Oronsay Priory, a scheduled monument of national importance, lies within the zone of influence but suffers from the same deficiencies identified elsewhere in the heritage assessment, notably the neglect of its open maritime context. Taken together, these shortcomings undermine the reliability of the environmental and heritage impact evaluations and suggest that the application has not fully grasped the scope or scale of effects on these islands and their distinctive character.

1.1.585 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a regular visitor to Islay, for nearly 20 years, I am concerned that the visual impact will negatively impact on tourism which is the lifeblood of the island. It is where you go to get away from industrialisation which would no longer be the case if this windfarm proposal goes ahead.

Based on my own local knowledge, I also wish to highlight that: Visiting Islay's unspoilt coast will be affected.

1.1.586 Further Comments

Please do not allow this industrial development to go ahead and ruin the unique and unspoilt Hebridean landscape. There are more appropriate landscapes.

1.1.587 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and cultural heritage of the area. However, published reviews of the applicant's documents reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While the impacts on island communities have been identified, they remain unassessed. Additionally, the ecological criteria stipulated have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently under consideration by the Scottish Ministers.

Given these shortcomings, it is urged that consent for the MachairWind Offshore Wind Farm be refused, along with the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, it is recommended that the determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also sought that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 159
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching heights up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment to the north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from the island of Iona and is proximate to the islands and coastal communities of the southern Hebrides.

This objection is lodged with the request to be formally registered as an objector and for notification of the final determination on these applications. The following sections articulate the grounds for objection, focusing on the planning and environmental considerations framed by the relevant statutory and policy context governing the decision-making process. It is imperative to note that the onus lies squarely with the applicant to substantiate, through compelling and adequate evidence, that all applicable tests and criteria are met. Objectors bear no responsibility to establish contrary proof. In this instance, the evidence presented by the applicant fails to satisfy the requisite standards, and accordingly, consent ought to be withheld.

1.1.588 Personal Observations

Based on my own local knowledge, I also wish to highlight that: No

1.1.589 Summary

The proposal for the MachairWind Offshore Wind Farm has not been substantiated as compliant with the relevant statutory and policy frameworks governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, analyses of the applicant’s documentation reveal that the extent of these impacts has been underestimated. Crucially, the essential heritage assessment has not been undertaken, and while the effects on island communities were identified, no formal assessment of these impacts has been conducted. Furthermore, the ecological requirements have not been demonstrated as achievable, and the application presented to the Scottish Ministers encompasses only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the related marine licence.

Should Ministers consider granting consent, it is requested that they first require the submission of additional environmental information alongside enhanced visual

representations. It is further proposed that determination of the applications be deferred until after a public inquiry, thereby allowing comprehensive scrutiny of the concerns raised in this objection. Regardless of the final decision, it is also sought that Ministers explicitly address and provide clear conclusions in their reasons regarding the impacts on cultural heritage and the island communities affected by the development.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 160
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind development with a capacity of approximately 2 gigawatts. The project envisages the installation of 91 to 144 turbines, each reaching up to 335 metres to blade tip, within a designated Windfarm Development Area spanning about 448 square kilometres of marine territory located north-west of Islay and west of Colonsay. Notably, this site lies approximately 21 kilometres from Iona and is proximate to the islands and coastal communities of the southern Hebrides.

This objection is grounded in both planning and environmental considerations, evaluated against the relevant statutory provisions and policy guidance that govern the determination of such applications. It is important to emphasise that the onus lies with the applicant to provide compelling and adequate evidence demonstrating compliance with all applicable legal and policy tests. Objectors, conversely, bear no obligation to prove contrary positions. Upon careful review, it is apparent that the applicant has failed to meet this evidential burden. Consequently, it is my clear position that the applications should not be granted consent.

I request that this correspondence be formally recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final decision regarding these applications.

1.1.590 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy’s support for renewable energy development. Specifically, it would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected. Additionally, the proposal does not show that island communities would be safeguarded, nor has it been established that the ecological requirements can be met based on the evidence provided. NPF4 Policy 11 supports renewable energy development only insofar as these impact criteria—including those addressing effects on communities and on landscape, seascape, and other receptors—are satisfied. The failure to meet these tests means the proposal conflicts with the policy’s provisions and cannot be regarded as compliant.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies that safeguard nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences for these designated assets. Specifically, Policy 11 must be read alongside Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities; Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the setting of historic

assets; and Policy 3 on biodiversity. The evidence clearly demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas are protected. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the proposal fails to satisfy the ecological tests required by Policy 3, as the submitted evidence does not demonstrate that these tests can be met. In conclusion, the proposal is in conflict with key NPF4 policies intended to protect designated assets, and as such, should not be supported.

The applicant's evidence acknowledges that the proposal would adversely affect the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2, as well as other relevant terrestrial development policies. This demonstrates a clear conflict with the development plan framework insofar as it relates to land-based effects. Furthermore, the proposal is inconsistent with the National Planning Framework 4 when considered in its entirety, and the applicant has not provided sufficient justification to overcome this fundamental conflict. Consequently, the proposal fails to accord with the established terrestrial planning policies that protect the local environment and community interests.

1.1.591 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment's conclusions fail to provide a reliable description of the effects the Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived

by a viewer in the field. This inherent limitation means that stakeholders and decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.592 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with that body. This methodology emphasises the need to evaluate whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is adequately retained, explicitly cautioning against equating visual change directly with adverse impact. However, a published Methodological Audit prepared in support of community objections, working solely from the applicant's Appendix 14.3,

identifies a critical shortcoming in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The Audit highlights that the assessment describes visual changes but does not perform the necessary evaluative step to establish whether the integrity of setting is preserved, a deficiency apparent in all examined worked examples. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the thoroughness of the applicant's assessment.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The applicant's evidence acknowledges that the heritage conclusions rely significantly on the findings of the landscape assessment. This interdependence is critical because any inaccuracies or shortcomings within the landscape assessment will directly influence the validity of the heritage impact appraisal. It is therefore essential that the landscape effects are thoroughly and accurately evaluated to ensure a reliable overall assessment.

However, it has been identified that the landscape assessment understates the extent of the landscape effects, as outlined previously. This understatement has the effect of diminishing the perceived impact on the heritage assets. Since the heritage conclusions are derived from the landscape assessment, they consequently adopt this understated perspective, potentially leading to an incomplete or overly optimistic evaluation of the heritage impacts.

Given this reliance and the identified deficiencies in the landscape assessment, the credibility of the heritage impact conclusions is undermined. A more robust and transparent approach is required to ensure that heritage effects are fully understood and appropriately weighted within the planning decision-making process. Without this, there remains a risk that the true scale of harm to heritage assets is not properly acknowledged or mitigated.

The proposed development fails to comply with key policy requirements aimed at the protection of heritage assets. Specifically, it does not satisfy the provisions set out in NPF4 Policy 7(h) concerning scheduled monuments, nor does it meet the criteria within Policies 7(c) and 7(d) related to the setting of heritage sites. These policies are further reinforced by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a clear framework for safeguarding the cultural significance of heritage assets.

Crucially, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained and protected. This omission represents a significant deficiency in the application, as the necessary assessment to support such a conclusion is absent. Without this critical information, it is not possible to ascertain the impact of the proposal on these valuable heritage resources.

Given the absence of a comprehensive assessment and the clear policy requirements that remain unfulfilled, the Scottish Ministers cannot be satisfied that the proposal accords with the heritage protection policies. Consequently, the application should not be approved as it currently stands, since it undermines the statutory obligations to protect and preserve heritage assets of national and international importance.

1.1.593 Effects on Island Communities, Tourism and the Local Economy

The applicant’s own baseline evidence confirms that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities of landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes directly threatens the fundamental economic foundations of these communities. This economic impact would inevitably undermine local services, diminish population levels, and jeopardise the long-term social and economic sustainability of the islands. Given this dependency, the proposal poses a significant risk to the continued viability of these communities.

The applicant’s own consultants have acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses potential impacts at a regional scale, focusing in detail on port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment asserts that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies differ markedly from regional averages. Their economic structures are concentrated in sectors most vulnerable to alterations in the qualities attracting visitors, and their reliance on increasing visitor numbers amplifies, rather than diminishes, their sensitivity to such changes. Therefore, the conclusion of low sensitivity for these island communities, reached without any place-specific analysis, lacks evidential basis and amounts to an unfounded assumption rather than a substantiated finding.

The proposal fails to meet essential planning and statutory requirements concerning island communities, resulting in an inadequate foundation for decision-making. Without sound socio-economic evidence and a precautionary approach where such evidence is absent, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, the assessment is fundamentally flawed. This deficiency undermines compliance with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which obligate meaningful engagement and careful consideration of island communities' interests throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny but did not conduct the necessary assessment to understand the potential impacts on these communities. This omission means the proposal cannot be demonstrated to be compatible with sustaining island communities, thereby failing to discharge the statutory duties owed to them. The absence of appropriate evaluation and engagement represents a significant shortcoming in the planning submission.

In light of these considerations, the proposal should not be approved as it does not satisfy the legal and policy framework designed to protect island communities. It is imperative that any development likely to affect these communities undertakes thorough assessment and meaningful engagement to ensure compliance with the relevant statutory duties and national planning policies.

1.1.594 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the potential ecological impacts of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the site itself. These designated features are indicative of high environmental sensitivity and conservation value, suggesting that any disturbance could have significant consequences.

Furthermore, the surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks. The introduction of extensive construction, operation, and eventual decommissioning activities over several decades raises concerns about the cumulative effects on these protected species and their habitats.

Given the scale and duration of the proposal, it is imperative to carefully assess and mitigate potential adverse environmental effects. The ecological importance of the area necessitates a precautionary approach to ensure that the natural environment is safeguarded throughout the development lifecycle.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. The preparation and presentation of these documents indicate a recognition by the applicant that there may be potential adverse effects on the integrity of this protected site as a result of the proposed development. Such documents are conventionally prepared and provided in circumstances where the possibility of an adverse effect cannot be definitively ruled out. The very inclusion of these materials in the application package is thus a significant feature, reflecting the applicant's

acknowledgement of potential environmental impacts that warrant careful consideration.

Moreover, the submission of these derogation and compensation documents operates within the framework that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant. This highlights a degree of uncertainty inherent in the assessment process and underscores the importance of these documents in addressing the requirements for derogation under relevant protection provisions. The compensation plan, focused on the guillemot population, seeks to mitigate potential harm to this protected species, aiming to offset any unavoidable impacts should the development proceed. In this context, the applicant's approach demonstrates an awareness of the statutory and policy obligations concerning protected sites and species, and an intention to comply with those obligations through appropriate mitigation and compensation measures.

The legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The applicant has not demonstrated that the statutory tests required to protect internationally important habitats and species can be satisfied. This conclusion is drawn from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance. Without clear assurance that these legal protections are upheld, the application fails to meet the necessary statutory criteria, thereby undermining the justification for granting consent.

1.1.595 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The cumulative impact assessment, as presented, relies directly on the baseline conclusions established in the Environmental Impact Assessment. Given that the underlying assessments for landscape, heritage, and socio-economic factors have been demonstrated to understate effects, the starting point for cumulative evaluation is inherently flawed. Consequently, the combined effects of this proposal, when considered alongside other existing, consented, and foreseeable developments, are similarly underestimated.

This reliance on a reduced baseline means the cumulative assessment does not fully capture the scale or significance of the overall impact. By not accurately accounting for the true extent of individual effects, the analysis fails to provide a reliable measure of the aggregate consequences that cumulative development would impose on the environment and communities. This shortcoming undermines the robustness of the planning decision-making process.

In conclusion, the cumulative impact assessment is therefore unreliable, as it underrepresents the true combined effects due to the flawed baseline assessments. For these reasons, the assessment should not be afforded significant weight in support of the proposal, and further, more rigorous analysis is required to ensure that all cumulative impacts are properly understood and addressed.

1.1.596 Public Engagement, Site Selection and Environmental Information

In comparing the proposed mitigation measures with the environmental information provided, it is evident that the Environmental Impact Assessment (EIA) falls short of sufficiency required for a robust determination. While the application includes various assessments, these rely on methodologies that do not substantiate their conclusions adequately. For instance, the landscape assessment applies outcomes based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate adherence to its prescribed integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. Moreover, the application anticipates the resolution of certain significant effects through future assessments, post-consent plans, monitoring, and additional approvals, which do not fulfil the EIA Regulations' requirement that likely significant effects must be comprehensively understood prior to determination.

Consequently, the Scottish Ministers are compelled to base their decision solely on the evidence presented at the time of determination, without reliance on assumptions that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted meets the adequacy standard necessary for informed decision-making. This insufficiency undermines the

integrity of the assessment and precludes the Ministers from confidently concluding that the environmental implications of the proposal have been properly identified and addressed.

1.1.597 Effects on Local Area

The applicant's assessment of impacts on Iona substantially underestimates the scale and significance of visual, community, and heritage effects, thereby undermining the reliability of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The overall effect is classified as Moderate and Significant, with turbines visible across approximately 39 degrees of the horizon over a distance of about 21 kilometres, including from the ferry crossing between Fionnphort and Iona. The West Coast of Iona, similarly, is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors across much of the island, including at Dùn Ì, its highest point. These acknowledged sensitivities suggest that mitigation measures fall short of addressing the breadth and depth of visual impact.

Moreover, the assessment fails to fully consider Iona's internationally important monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, remains unfulfilled, with no visualisation provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Community concerns are also inadequately addressed; a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which was never assessed. The visual scale of the turbines can be contextualised by comparison to Ben Hynish on Tiree, which, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by some 194 metres at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's evaluation significantly underestimates the adverse effects on Iona, warranting a more rigorous and comprehensive appraisal.

The applicant's assessment fails to adequately recognise the practical consequences for the coastal communities of Mull and Ross of Mull, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the principal embarkation point for visitors, is acknowledged by the applicant as experiencing significant effects; yet, no detailed place-based assessment has been undertaken to understand the full economic and social implications for this community, which is directly bound to visitor flows. Similarly, the Ross of Mull South coastal area, assessed as having high sensitivity at distances of 22 to 24 kilometres and attributed a medium magnitude of effect, encompasses key locations such as Erraid and core paths that are accepted to be significantly impacted, yet the applicant's evaluation does not sufficiently reflect the cumulative consequences for local residents and businesses.

Throughout Mull, significant effects are conceded by the applicant on core paths and within designated landscape areas, including the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, covering the western waters and islands, is identified as having high sensitivity over distances ranging from 21 to 33 kilometres, but the assessment limits the magnitude of effects to medium at most. This approach underestimates the visual intrusion and consequential disruption to the integrity of these valued landscapes, which underpin the local tourism economy and community identity. The applicant's reliance on distance alone to diminish the scale of change, as exemplified in the treatment of the Wilderness and Gribun Rocks area where a viewing distance of over 30 kilometres leads to the judgement of a small scale of change, reveals a fundamental flaw in the assessment methodology.

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers, depends heavily on the unspoiled Atlantic seascape that would be industrialised by the proposed development. Despite this clear reliance, the applicant has not conducted place-specific assessments for these communities, leaving a significant gap in understanding the real impact on their economic viability and landscape character. In light of these shortcomings, it is evident that the applicant's assessment insufficiently addresses the significant visual, economic and community effects on Mull and Ross of Mull, thereby failing to meet the level of scrutiny required for a development affecting such sensitive and tourism-dependent areas.

1.1.598 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant adverse impacts on nationally designated landscapes, as well as on the coastal communities and their cultural heritage. However, a more detailed examination of the applicant's published analyses reveals that these impacts have been consistently underestimated. Notably, a comprehensive heritage assessment, as required, has not been undertaken. Furthermore, while the effects on the island communities affected by the development were identified, they have not been subject to any substantive evaluation. The ecological criteria established by relevant policy have also not been demonstrated to be achievable. In addition, it is important to note that only a portion of the overall project has been submitted to the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers be inclined to grant consent, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, it is essential that the determination of these applications only proceeds following a public inquiry, which would allow for a thorough examination of the concerns raised in this objection. Regardless of the decision ultimately reached, it is further requested that the Ministers explicitly address and provide clear conclusions on the impacts upon cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 161
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with an installed capacity of approximately 2 GW. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

It is requested that this letter be formally recognised as an objection, that my details be recorded accordingly, and that I receive notification of the final decision in relation to these applications.

The following sections detail the planning and environmental grounds underpinning this objection, framed within the statutory and policy context applicable to the determination of these proposals. It is important to emphasise that the onus lies with the applicant to provide robust and sufficient evidence to satisfy all relevant statutory tests. Objectors bear no legal obligation to disprove the proposals. Upon careful consideration of the evidence submitted, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

1.1.599 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not sufficiently address these requirements, leaving significant uncertainty as to whether these statutory duties have been properly considered or fulfilled.

Given that the Scottish Ministers are also required to have regard to these same statutory duties in determining the application, the failure to demonstrate compliance or to provide adequate evidence of mitigation measures constitutes a material deficiency. Where such compliance has not been demonstrated, or where evidence identifies omissions or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the statutory obligations under Schedule 9 of the Electricity Act 1989.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies

of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence showing conformity with these policies undermines the statutory assessment process required for authorisation decisions.

Given that compliance with these policies has not been demonstrated, and the evidence reveals deficiencies and omissions in the application's consideration of the applicable legal and policy framework, these failures weigh decisively against the granting of consent. The application's shortcomings in addressing the National Marine Plan's requirements constitute a fundamental procedural and substantive defect that precludes lawful authorisation under the Marine (Scotland) Act 2010. Accordingly, the marine licence should be refused.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this development.

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters weigh decisively against the granting of consent. In this case, the proposal's failure to address these critical policy requirements undermines the statutory and policy framework intended to protect biodiversity, natural environments, historic assets, and energy considerations.

Accordingly, the application should be refused on the basis that it does not meet the mandatory standards set out in NPF4, and the identified policy breaches constitute a clear and material planning objection.

The applicant's submission fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the likely significant environmental effects of the proposal be identified, thoroughly assessed, and transparently reported prior to any determination. The absence of a comprehensive and compliant EIA undermines the decision-making process by leaving critical environmental impacts insufficiently examined and documented. This deficiency is not a minor procedural oversight but a fundamental failure to meet statutory requirements designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which demand a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these tests,

nor does it adequately address potential adverse impacts on designated habitats. This omission represents a clear conflict with the legal framework governing the protection of biodiversity and designated conservation sites. Without a proper Habitats Regulations Assessment (HRA), the proposal cannot be considered lawful or consistent with established environmental protection policies.

Given these significant shortcomings—the incomplete EIA and the failure to conduct a compliant HRA—the proposal is in direct conflict with the statutory and policy requirements set out to ensure environmental protection. Where compliance has not been demonstrated, and where evidence reveals deficiencies and omissions, these matters must weigh decisively against the granting of consent. The application, as it stands, does not meet the necessary legal standards and should therefore be refused on these grounds.

The applicant's submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework establishes a clear duty to ensure that any development proposals affecting island communities are assessed with particular regard to their unique social, economic, and environmental circumstances. The Act's provisions are designed to safeguard the sustainability and well-being of island populations by embedding their interests as a material consideration in planning decisions.

However, the evidence before the determining authority reveals a failure to demonstrate compliance with this statutory duty. The application documentation does not adequately address how the proposal has taken into account the specific interests of the island community, nor does it provide sufficient evidence that these interests have been properly weighed against other material considerations. This omission constitutes a significant deficiency in the planning submission, as it conflicts with the explicit requirements of the Islands (Scotland) Act 2018. The absence of a thorough and transparent assessment of the proposal's impact on the island community undermines the integrity of the decision-making process and contravenes the applicable legal and policy framework.

Given these shortcomings, the failure to properly consider and give due weight to the interests of the island community must weigh against the granting of planning consent. The statutory duty imposed by the Islands (Scotland) Act 2018 is not discretionary, and where compliance has not been demonstrated, the planning authority is obliged to take this into account as a material factor. In this instance, the evidential deficiencies and procedural omissions identified in the application are sufficient to justify refusal, as the proposal does not meet the legal requirements designed to protect island communities. Accordingly, the proposal should not be approved in its current form.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental breach of the evidential burden incumbent upon the applicant. The submitted documentation contains deficiencies and omissions that remain unaddressed, resulting in unresolved conflicts with the applicable legal and policy framework.

Given that compliance has not been satisfactorily demonstrated, these shortcomings must weigh decisively against the granting of consent. In conclusion, the application does not meet the necessary evidential standards to satisfy legal and policy obligations and therefore should be refused.

1.1.600 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the current proposal aligns with the impact criteria established by National Planning Framework 4 (NPF4) Policy 11, despite the policy's general support for renewable energy development. It is essential to recognise that this support is contingent upon compliance with specific impact tests, including those relating to communities, landscapes, seascapes, and other sensitive receptors as set out in Policy 11(c), (d), and (e). Without clear evidence demonstrating adherence to these criteria, the proposal's legitimacy under NPF4 is called into question.

Further examination reveals that the proposal is in conflict with these requirements. It would lead to significant adverse effects on nationally designated landscapes and seascapes, an outcome that contradicts the protective intentions of NPF4. Moreover, there is an absence of satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, a factor critical to maintaining the integrity of the historic environment. The safeguarding of island communities, which Policy 11 seeks to ensure, also remains unproven, adding to the concerns surrounding the proposal.

Finally, the ecological assessments submitted with the proposal fail to provide assurance that the necessary tests can be met, further undermining confidence in its compliance with Policy 11. Taken together, these unresolved issues indicate that the proposal does not meet the comprehensive impact criteria required by NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy developments in this context. It is therefore incumbent upon the decision-making authority to carefully consider these shortcomings before granting consent.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

Uncertainty remains regarding the extent to which the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This raises significant concerns about the compatibility of the development with the established planning objectives for the area.

In light of these considerations, the proposal is clearly in conflict with both the relevant development plan and the overarching National Planning Framework 4 when read in its entirety. The applicant has not provided sufficient evidence to dispel these conflicts or to demonstrate that the proposal would comply with the policy framework. Therefore, it is concluded that the proposal should not be supported in its current form.

1.1.601 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, which critically examines the applicant's Chapter 16 and related appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This inherent reliance on distance is further corroborated by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance. The Landscape Character synthesis likewise categorises magnitude of impact as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises serious concerns regarding the robustness of the assessment's conclusions. By attenuating the perceived magnitude of change precisely where the most important receptors lie, the protective tests applied are effectively based on understated inputs. Consequently, the outcomes presented do not reliably reflect the true effects that the Scottish Ministers are being asked to consent to, thereby undermining confidence in the assessment's capacity to safeguard sensitive landscapes adequately.

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that stakeholders and decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual

impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

While mitigation measures may seek to minimise the visual impact of the proposed development, the introduction of aviation and navigation lighting represents an unavoidable change to the night-time seascape character. Currently, the sea horizon is unlit, and the permanent addition of such lighting over the 35-year operational period would fundamentally alter this aspect of the seascape. It is important to note that the operational lifespan does not confine the extent of harm in planning terms; consenting to the development effectively signifies acceptance that this seascape is appropriate for wind farm use. Therefore, despite potential mitigations, the development would result in a lasting and significant transformation of the night-time seascape character.

The applicant's evidence acknowledges that the proposed development results in effects that engage several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts. However, despite recognising these policy requirements, the applicant has not satisfactorily demonstrated that its assessment of the scale of these effects aligns consistently with its own stated methodology.

Moreover, the applicant has failed to establish compliance with the protections afforded to nationally significant landscape and seascape interests. Without clear evidence to reconcile the conclusions drawn with the necessary policy safeguards, it remains uncertain that the proposal respects the statutory framework designed to preserve these valued environmental assets. This lack of demonstrable compliance raises substantive concerns regarding the proposal's conformity with relevant planning policies.

1.1.602 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and whether the integrity of setting is retained, the assessment does not demonstrate that it has undertaken this evaluative step. Instead, the assessment predominantly describes visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting is adequately retained. This approach conflates visual change with adverse impact, contrary to the methodology's explicit guidance. A Methodological Audit prepared in support of community objections, analysing the applicant's Appendix 14.3, confirms

that while heritage attributes are identified, the critical evaluation of setting integrity required by the methodology is absent from all examined examples.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

The heritage impact conclusions rely substantially on the findings of the landscape assessment. However, as identified in the evidence, there is an understatement of landscape effects within that assessment. This understatement directly affects the heritage conclusions, causing them to inherit the same deficiencies. Consequently, the credibility of the heritage impact assessment is undermined by its dependence on a landscape analysis that does not fully capture the extent of landscape effects.

The application fails to provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets. Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

1.1.603 Effects on Island Communities, Tourism and the Local Economy

The proposal threatens the fundamental economic and social sustainability of the island communities by undermining the very qualities that attract their essential visitor base. These communities rely exceptionally heavily on visitors who are drawn to the landscape, seascape, cultural heritage, tranquillity and remoteness—all attributes explicitly identified in the applicant's own baseline assessments. Any alteration to these qualities directly jeopardises the economic foundation of these

islands. This, in turn, would have cascading effects on local services, population retention and the overall viability of the communities. Consequently, the proposal poses a significant risk to the long-term sustainability of these island settlements.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

The applicant acknowledges that island communities warrant particular scrutiny in the planning process; however, it has failed to conduct the necessary assessment to understand the proposal's effects on these communities. Despite this recognition, there is no demonstration that the development aligns with the principles of sustaining island communities, nor that the statutory duties owed to them have been fulfilled. This omission undermines confidence that the proposal adequately addresses the specific socio-economic and cultural circumstances of island populations.

This shortfall directly contravenes established policy and statutory requirements. Specifically, the proposal engages with GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate decisions to be based on robust socio-economic evidence and to adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear obligation to assess and give meaningful weight to the interests of island communities through comprehensive engagement from the earliest stages to the conclusion of the planning process. Given the absence of such assessment and engagement, the proposal does not comply with these critical policy and statutory standards, thereby failing to safeguard the well-being and sustainability of island communities.

1.1.604 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation

importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site's integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

The applicant's evidence clearly establishes that under the Habitats Regulations, consent for developments potentially impacting protected habitats and species can only be granted when the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site. This requirement is absolute unless the strict derogation tests are satisfied. Crucially, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The evidential burden lies with the applicant to demonstrate this to the requisite standard. Importantly, proposals for mitigation, compensation, or future monitoring, while relevant, do not in themselves satisfy the statutory tests or guarantee lawful consent.

This legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embed the stringent requirements of the Habitats Regulations within the planning system, ensuring that developments affecting designated sites are rigorously assessed. The high evidential threshold and comprehensive policy context emphasize the necessity for applicants to provide robust, conclusive scientific evidence demonstrating no adverse impact before consent can be lawfully granted. This ensures the protection of sensitive ecological interests in accordance with statutory and policy mandates.

The applicant's own derogation documents, together with the totality of evidence submitted, fail to demonstrate that the statutory tests designed to protect internationally important habitats and species can be met. This lack of certainty undermines the legal foundation required to grant consent, as the statutory safeguards exist precisely to ensure that such ecological features are not compromised. Consequently, the application does not satisfy the necessary legal criteria for protecting these internationally significant environmental assets.

1.1.605 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

While mitigation measures are often presented as sufficient to address individual development impacts, the reliability of the cumulative impact assessment itself is compromised by foundational flaws in baseline evaluations. Specifically, the cumulative assessments rely heavily on the conclusions of the Environmental Impact Assessment, which, as identified, understates effects across landscape, heritage, and socio-economic dimensions. This underestimation at the baseline level means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are likewise understated. Consequently, the cumulative impact assessment does not provide a robust or accurate reflection of the true scale of combined effects, thereby diminishing the effectiveness of mitigation strategies predicated on this assessment. In summary, the cumulative effects have been understated due to flawed baseline assessments, undermining confidence in the overall impact evaluation.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the

Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.606 Public Engagement, Site Selection and Environmental Information

There remains significant uncertainty regarding the adequacy of public participation in the site-selection and application stages of this proposal. The applicant places considerable weight on the site-selection process, making the quality of engagement during that stage directly relevant to the legitimacy of their case. However, the deficiencies observed in public involvement at earlier stages have persisted into the current application, which comprises an extensive volume of technical documentation.

The timing of the consultation period exacerbates these concerns. It has coincided with the busiest months for island communities, when residents are heavily engaged in continuous work throughout the visitor season, and access to specialist advice is limited. In contrast, the applicant has had years to prepare their submission, supported by substantial professional and financial resources. This imbalance raises questions about whether affected communities have been afforded a realistic and meaningful opportunity to participate in decisions of such significance.

National policy and international principles provide clear guidance on public participation. GEN 18 of the National Marine Plan, together with the Aarhus Convention’s emphasis on effective involvement, require that those impacted by proposals have a genuine chance to influence outcomes. The conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers carefully weigh these participation concerns when considering the representations put forward.

The Environmental Impact Assessment (EIA) submitted with this application fails to provide sufficient information for the Scottish Ministers to make an informed decision, as required by the EIA Regulations. Although the assessment identifies pathways to significant effects across multiple topics, it does not investigate these effects adequately. For example, the landscape assessment relies on a distance pattern outcome not supported by its own methodology; the heritage assessment does not apply its stated integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands. These shortcomings demonstrate that the EIA is insufficiently robust in its current form.

Moreover, the application frequently depends on future assessments, post-consent plans, ongoing monitoring, and further approvals to address outstanding issues. Such reliance is inconsistent with the statutory requirement that likely significant effects must be clearly understood prior to determination. The procedural framework obliges the decision-makers to have comprehensive and conclusive environmental information at the time of consideration, not to proceed on the assumption that unresolved matters will be satisfactorily dealt with later.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to properly assess the potential impacts of the proposal. As the principal evidential basis for the decision, the EIA must be sufficient in scope and detail at the point of determination, which is not the case here. Therefore, the application should not be approved in its current form.

1.1.607 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This acknowledgement implicitly concedes that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, thereby compromising the overall accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly facing the development site, with extensive visibility and a large geographical extent of change spanning approximately 21 kilometres. The proposed turbines would extend across around 39 degrees of the horizon, affecting key views including the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, where the applicant concedes significant effects for residents and visitors, including those at Dùn Ì, the island's highest point. Importantly, Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—holds international heritage significance, closely tied to pilgrimage and maritime arrival. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment. Community concerns further underscore the impact; a household consultation revealed that 92 per cent of

respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential effect pathway that remains unassessed. To contextualise the scale, the largest proposed turbines would exceed the height of Ben Hynish on Tiree by approximately 194 metres, appearing substantially larger despite being at roughly two-thirds of the distance from Iona. These factors collectively demonstrate that the applicant's evaluation does not fully capture the significant and wide-ranging effects on Iona, undermining the robustness of the environmental and social impact conclusions.

The applicant's assessment recognises significant effects on various parts of Mull and the Ross of Mull coastal communities, notably acknowledging high sensitivity in the Ross of Mull South coastal area at distances of approximately 22 to 24 kilometres with a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross. Importantly, Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—is identified as experiencing significant effects, reflecting its direct connection to visitor flows. Similarly, significant impacts are noted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as on the Loch na Keal National Scenic Area, which is of high sensitivity throughout a range of 21 to 33 kilometres, though the magnitude attributed does not exceed medium.

However, the applicant's methodology relies heavily on distance as a determinant of impact, as illustrated by the assessment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, exemplifying the distance-based reasoning that this objection challenges. This approach risks underestimating the true significance of visual and experiential effects on sensitive landscapes and communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

Moreover, the assessment does not adequately address the economic and community implications for Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers reliant on the integrity of the Atlantic seascape. This seascape faces potential industrialisation from the proposed development, yet none of these coastal communities has been subject to a detailed, place-based evaluation. Without such focused consideration, the full extent of adverse effects on tourism-dependent economies and community cohesion remains insufficiently understood.

The applicant's assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses the islands of Ulva and Staffa, as well as the Jura and Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, a community-owned island situated within Loch na Keal, is highlighted as a small, re-establishing community whose regeneration relies heavily on the unspoilt seascape and natural setting. Notably, the applicant's assessment does not include any specific evaluation of the effects on Ulva, thereby omitting consideration of impacts on a vulnerable island community dependent on the very qualities at risk. Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development, is recognised for its panoramic maritime qualities and status

as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change would be small and not significant, even though this lies beyond the 30-kilometre threshold NatureScot suggested for assessing impacts on National Scenic Area qualities.

The Jura National Scenic Area, characterised by its wild and undeveloped Atlantic outlook, is assessed by the applicant as having high sensitivity at a distance of approximately 28 to 32 kilometres from the development site. However, the magnitude of impact is rated only as medium to low, primarily justified by distance, apparent scale, and retention of landforms. A similar approach is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated 35 to 40 kilometres away, receiving the same moderate treatment. This approach underestimates the potential significance of effects on these designated landscapes by placing disproportionate weight on distance and visual scale without fully accounting for the intrinsic qualities that underpin their designation. Consequently, the assessment fails to adequately protect the natural and cultural characteristics of these important seaboard landscapes and their associated island communities.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres distance. This practical conclusion severely understates the true extent of the impact on Tiree's landscape, resulting in an unreliable evaluation that could misinform decision-making and undermine effective mitigation.

Tiree's landscape character is exceptionally distinctive, defined by its low-lying terrain and the dominance of sea and sky. The island's highest point, Ben Hynish, rises to just 141 metres, reinforcing an open oceanic horizon free from vertical intrusions. Introducing turbines reaching up to 335 metres would represent a dramatic departure from this established seascape character, creating unprecedented vertical structures that would be highly conspicuous and discordant.

Given the fundamental role that openness and horizontality play in defining Tiree's landscape, the applicant's Low magnitude conclusion for such an exposed and sensitive receptor is fundamentally flawed. It significantly understates the magnitude of change and impact, thereby compromising the reliability of the assessment and the planning process that depends upon it.

The applicant's assessment fails to consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the applicant's distance-based visual impact mitigation approach fails to address

adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant's overall assessment.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This approach effectively reduces the assessed magnitude of change and diminishes the perceived significance of impacts at these greater distances. When compared to standard mitigation practices, which require thorough and place-specific evaluations regardless of distance, the applicant's methodology falls short by not adequately capturing or addressing the full extent of environmental consequences experienced by distant communities.

Taken together, the evidence demonstrates a clear and concerning pattern: wherever a highly sensitive receptor lies beyond the 20-kilometre threshold, the assessment attenuates the magnitude of impact without conducting a detailed, place-based analysis. Consequently, the communities residing in these areas receive no specific assessment of the effects they endure, undermining the integrity and comprehensiveness of the environmental impact assessment. This systematic discounting of significant effects beyond 20 kilometres fails to meet the necessary standards for a robust and equitable evaluation of environmental impacts.

1.1.608 Personal Observations

In addition to the planning matters above, I am personally concerned because: We pay to generate electricity which we in Scotland cannot use. We therefore do not require generation of further capacity which we will pay not to use

Based on my own local knowledge, I also wish to highlight that: No

Finally, I would also ask the Scottish Ministers to consider: Development of infrastructure to utilise our current generation ability before we allow this project to generate more unused electricity

1.1.609 Further Comments

No

1.1.610 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the applicable statutory and policy frameworks. The applicant's own

evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Furthermore, the necessary heritage assessment has not been conducted. While the presence of effects on the island communities affected by the development was identified, no formal assessment of these impacts has been undertaken. In addition, the ecological tests required under the relevant legislation remain unproven, and it is notable that only a portion of the project is currently before the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, a public inquiry should be held prior to determination, to allow a thorough examination of the issues raised in this objection. Regardless of the decision reached, it is also urged that the Ministers provide clear and explicit conclusions within their reasons, specifically addressing the effects on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 162
Dear Sir/Madam,

I hereby register my formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, put forward by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails constructing an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would encompass between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. The site is located within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea situated north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in detailed planning and environmental considerations, evaluated within the relevant statutory and policy frameworks that govern these applications. It is important to emphasise that the responsibility lies entirely with the applicant to provide sufficient evidence demonstrating that all relevant statutory and policy tests have been met. Objectors, such as myself, are not required to prove the contrary. Upon careful review, it is apparent that the applicant has failed to discharge this burden adequately. Consequently, the applications should be refused consent. I request that I be formally recorded as an objector and informed of the outcome of the decision-making process.

1.1.611 Legislative and Policy Framework

The marine licence application must be refused as it fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Authorisation decisions under this legislation are mandated to accord with the National Marine Plan unless material considerations indicate otherwise. In this case, the application does not meet the necessary standards set out in key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The absence of demonstrated compliance with these policies constitutes a fundamental deficiency in the application. Furthermore, the evidence identifies omissions and conflicts with the applicable legal and policy framework, which must weigh decisively against the granting of consent. Therefore, on the basis of the statutory assessment requirements and the failure to satisfy the National Marine Plan policies, the marine licence application should be refused.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are directly

engaged by this proposal. However, the evidence before the determining authority does not demonstrate compliance with these key policies.

NPF4 must be applied alongside relevant statutory duties and legislative requirements, and where compliance is not shown, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent. In this case, the applicant has failed to provide sufficient evidence to confirm that the proposal meets the biodiversity objectives of Policy 3, nor has it adequately addressed the protection and enhancement of natural places as required by Policy 4. Similarly, the impact on historic assets and places has not been satisfactorily assessed or mitigated in accordance with Policy 7. Furthermore, the proposal does not demonstrate conformity with Policy 11 concerning energy considerations.

Given these unresolved deficiencies and the absence of demonstrated compliance with the statutory and policy requirements of NPF4, the proposal conflicts with the applicable legal and policy framework. Consequently, these matters must be afforded significant weight against the granting of planning permission.

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal's environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be properly considered and given due weight in the decision-making process. The submitted evidence does not show that these statutory obligations have been met. This omission constitutes a clear deficiency and procedural failure in the application's assessment. As established by the Act and confirmed in the supporting evidence, where such compliance is not demonstrated, or where there are identified omissions or conflicts with the legal and policy framework, these factors must weigh against the granting of consent. Therefore, on the basis of the proposal's failure to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and

environmental assessment requirements. This failure means that the necessary evidential burden to satisfy legal and policy frameworks remains unmet.

As a direct consequence, the application contains deficiencies and omissions that have not been addressed or justified. These unresolved issues represent clear conflicts with the applicable legal and policy framework, undermining the integrity of the assessment process.

Given the absence of demonstrated compliance and the presence of identified shortcomings, these matters must weigh decisively against the granting of planning consent. The application, therefore, should be refused on the basis that the applicant has not fulfilled their fundamental responsibility to prove adherence to all legal and policy obligations.

1.1.612 Conflict with National Planning Framework 4 and the Development Plan

The proposal must be assessed against the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, which, while supportive of renewable energy development, requires that such support be contingent upon compliance with specific safeguards. As outlined in Policy 11, these safeguards include considerations of impacts on communities (Policy 11(c)), as well as on landscape, seascape, and other receptors (Policies 11(d) and 11(e)). The policy's intent is clear: renewable energy projects must not circumvent these impact tests, but rather must demonstrate how adverse effects will be avoided or mitigated in accordance with the policy's requirements.

In applying these criteria to the current proposal, it becomes evident that it fails to meet the necessary standards. There is clear evidence that the development would cause significant adverse effects on nationally designated landscapes and seascapes, undermining their conservation and value. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments, including their settings, would be adequately protected, nor has it been shown that the interests of island communities would be safeguarded from harmful impacts. Additionally, the ecological assessments provided do not satisfactorily confirm that the necessary ecological safeguards can be achieved. Taken together, these shortcomings amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby weakening any policy support for the proposal's advancement.

The proposal must be assessed in the context of several interrelated policies within NPF4 that collectively seek to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 functions alongside Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities. Furthermore, Policy 7 addresses the protection of scheduled monuments, particularly through Policy 7(h), and includes provisions concerning the settings of historic assets under Policies 7(c) and 7(d). Policy 3 complements these protections by establishing requirements for the conservation and enhancement of biodiversity.

In light of the evidence presented, the proposal conflicts with these critical policies. It would result in significant adverse effects on nationally designated landscapes and

seascapes, undermining the very qualities for which these areas are protected. Moreover, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. There is also a failure to show that island communities, which often rely on the integrity of their natural and historic environments, would be adequately safeguarded by the development. This lack of demonstration raises substantial concerns regarding compliance with the policies aimed at heritage and community protection.

Finally, the ecological requirements set out under Policy 3 have not been evidenced as being capable of fulfillment based on the materials submitted. Without convincing evidence that the ecological tests can be met, the proposal remains contrary to the biodiversity objectives enshrined in NPF4. Taken together, these shortcomings indicate that the proposal does not comply with the suite of policies designed to protect designated assets at the national level, and as such, the proposal should be reconsidered in light of these significant policy conflicts.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These effects are material to the land-based environment and directly conflict with the policies designed to protect these valued attributes. As such, the proposal's quantified detrimental influence on these elements cannot be overlooked or mitigated within the existing planning framework.

Given these findings, it is clear that the proposal is inconsistent with the relevant development plan framework. The Local Development Plan 2 explicitly seeks to preserve the character and integrity of the area's landscape and heritage assets, which the proposal would compromise. Furthermore, this inconsistency extends to the National Planning Framework 4 when considered in its entirety, as the applicant has failed to demonstrate compliance or provide evidence to the contrary.

In conclusion, the proposal is fundamentally at odds with the established terrestrial development plan policies and the overarching national framework. This conflict undermines the rationale for granting consent and strongly supports refusal. The adverse effects on landscape, heritage, and community interests weigh decisively against the proposal, and it should therefore be rejected in accordance with the statutory development plan and national planning policy.

1.1.613 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant's written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant's own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant has adopted, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers must exercise caution when interpreting these images, as they may underestimate or misjudge the development's visual presence within the landscape.

Furthermore, the wireline drawings included within the panoramic projections share the same inherent limitations as the accompanying photographic images. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to the photographs. Consequently, they do not overcome the fundamental constraints of the visual materials and cannot be relied upon to provide a fully accurate or objective representation of the proposed development's appearance. This recognition tempers the confidence that can be placed in the visual evidence as a comprehensive tool for assessing visual impact.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the character of the night-time seascape. Currently, the sea horizon remains unlit, and the addition of such lighting over the stated 35-year operational lifespan would fundamentally change this aspect of the environment. This practical consequence must be carefully weighed, as it represents a significant and ongoing visual impact that cannot be mitigated by the passage of time within the operational period.

Furthermore, the 35-year timeframe does not diminish the policy implications of this harm. Granting consent to this development effectively signifies that the seascape in question is deemed suitable for wind farm use despite these lighting effects. This policy position has long-term ramifications beyond the mere operational lifespan, as it establishes a precedent regarding acceptable impacts on seascape character. Consequently, the decision to permit the development must consider both the

immediate and enduring consequences of introducing artificial lighting to an otherwise unlit marine environment.

The proposal's failure to adequately assess and mitigate its environmental impacts results in a clear breach of key planning policies designed to safeguard important landscape and seascape interests. This non-compliance threatens the integrity of nationally significant natural assets, undermining the practical objective of preserving these environments for current and future generations. Without a robust demonstration of policy adherence, the potential for irreversible harm remains unacceptably high.

The applicant's submission notably lacks consistency between the scale of acknowledged effects and the methodology applied to reach those conclusions. This inconsistency calls into question the reliability of the environmental assessment and weakens confidence in the proposal's capacity to address adverse impacts effectively. Consequently, the assessment falls short of the standards set by NPF4 Policies 4(c), 4(d), 11(d), 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan, which collectively establish clear expectations for protecting nationally important landscapes and seascapes.

Given these deficiencies, the proposal cannot be considered compliant with the relevant planning policies. In the absence of demonstrable adherence to these statutory requirements, the development should not be approved. Safeguarding the nation's valued environmental assets must remain paramount, and any proposal failing to meet this threshold risks causing unacceptable and potentially irreversible harm.

1.1.614 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while formally adopting Historic Environment Scotland's recognised approach, ultimately fails to fulfil the essential evaluative requirements set out therein. The methodology expressly mandates that any assessment of effects on the setting of historic assets must consider not only visual changes but also the extent to which these changes affect the contribution that setting makes to the cultural significance of the heritage asset, with particular emphasis on whether the integrity of that setting is retained. Importantly, it clarifies that visual change alone should not be equated directly with adverse impact. This nuanced approach necessitates a clear demonstration of how the integrity of setting has been evaluated in the context of the proposed development's effects.

However, a Methodological Audit, conducted independently and based exclusively on the applicant's Appendix 14.3, reveals a significant shortcoming in this respect. While the operational assessment identifies relevant heritage attributes and provides a detailed description of visual changes—covering aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it stops short of the critical analytical step required by the adopted methodology. The audit finds no evidence that the assessment explicitly evaluates how these visual changes influence the integrity of setting or the contribution setting makes to cultural significance, as mandated. Instead, the assessment concludes that the integrity of setting is adequately retained without demonstrating the reasoning or

analysis that supports this conclusion. Consequently, this omission undermines the reliability of the applicant's conclusions regarding heritage impacts, casting doubt on the robustness of the overall assessment.

The practical consequence of the applicant's approach is that the assessment risks underrepresenting the full extent of the cultural significance associated with the heritage assets. The baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements emphasise experiential connections formed through travel and interaction with the landscape, rather than static views. Consequently, an assessment focusing primarily on fixed viewpoints may fail to capture the nuanced relationships between monuments, spirituality, and the surrounding land and seascape that contribute to the heritage assets' value.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this concern by requesting additional viewpoints to better represent these wider cultural qualities. This suggests that the applicant's existing assessment framework may not fully address the complex, experiential nature of the cultural landscape. To ensure an accurate and comprehensive understanding of heritage impacts, it is essential that the assessment incorporates these broader perspectives, reflecting the interconnected and dynamic character of the affected heritage assets.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the

protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.615 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant's own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 adopts a regional approach, focusing in detail on potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nonetheless, the assessment concludes that these island communities possess low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are most vulnerable to changes in the characteristics that attract visitors. Rather than diminishing their sensitivity, dependence on increasing visitor numbers actually intensifies the vulnerability of these communities to any alterations in those qualities. Therefore, the conclusion of low sensitivity drawn without a place-specific analysis is not supported by evidence but rests on an unfounded assumption.

In summary, the applicant's socio-economic assessment methodology is inadequate for understanding or mitigating impacts on island communities, as it neglects the particular vulnerabilities and economic dependencies inherent to such locales. This gap undermines the reliability of the assessment's findings regarding the sensitivity of the island communities affected by the proposal.

The proposal fails to meet essential planning and statutory requirements concerning island communities, notably neglecting the thorough assessment demanded by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions affecting island communities be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be carefully evaluated and given due weight through meaningful engagement from the earliest stages through to the conclusion of any decision-making process.

Despite recognising that island communities warrant particular scrutiny, the applicant has not conducted the necessary assessment to comprehend fully the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with sustainable island communities, and as such, the applicant has not satisfied the statutory duties owed to these populations. This omission represents a significant shortfall in meeting the standards set by relevant policy and legislation, undermining the integrity of the decision-making framework.

In conclusion, given the quantifiable lack of assessment and failure to discharge statutory obligations, the proposal cannot be considered compliant with the comprehensive planning and statutory duties designed to protect island communities. It is therefore appropriate that the proposal be refused on these grounds to ensure that the interests and sustainability of island communities are properly safeguarded.

1.1.616 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

Consent for developments affecting protected habitats and species can only be granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the protected site. Under the Habitats Regulations, the competent authority must be satisfied beyond reasonable scientific doubt that the statutory tests are met; otherwise, consent cannot be lawfully issued. This exacting evidential standard places the burden of proof firmly on the applicant. Importantly, reliance on mitigation, compensation measures, or future monitoring alone is insufficient to meet

these tests. This stringent legal framework is reinforced by the requirements set out in the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. In summary, any proposal must provide robust and definitive evidence of no adverse effect on site integrity before consent can be granted, reflecting the high level of protection afforded to these habitats under current law and policy.

The applicant's submissions fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. Despite the inclusion of derogation documents intended to support the case, these materials reveal an insufficient degree of certainty that the necessary legal safeguards can be met. This absence of clarity undermines the fundamental requirements imposed by relevant environmental legislation, which demand rigorous proof that adverse effects on protected ecological features will be avoided or adequately mitigated.

Given this evidential shortfall, the application cannot be regarded as satisfying the statutory criteria for consent. The failure to establish that the prescribed tests have been met calls into question the legitimacy of any grant of permission. In light of the above, the case for allowing the proposed development is significantly weakened, and refusal is warranted to ensure the protection of internationally important ecological assets.

1.1.617 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

The cumulative impact assessment presented in the Environmental Impact Assessment is fundamentally unreliable due to flawed baseline assessments.

Specifically, the cumulative assessments rely on conclusions drawn from the underlying landscape, heritage, and socio-economic evaluations. As these foundational assessments understate the effects, the cumulative assessment consequently adopts a reduced baseline. This approach results in an underestimation of the combined effects of the proposed development alongside existing, consented, and foreseeable projects. Therefore, the true scale of cumulative impacts is obscured, undermining the accuracy and credibility of the overall environmental appraisal.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Unlike a comprehensive assessment that would encompass all related works, including deferred elements, the current approach does not reliably identify or evaluate the cumulative and in-combination effects of the proposal in its entirety. This omission undermines the ability to compare and consider appropriate mitigation measures effectively across the full scope of the project.

Given this deficiency, it is essential that the decision-making process explicitly addresses the treatment of the deferred works to ensure compliance with policy and regulatory frameworks. Without such consideration, the potential environmental impacts may be underestimated, leading to insufficient mitigation and an incomplete understanding of the proposal's overall effects. Accordingly, the application as submitted does not satisfy the necessary standards for environmental assessment and planning policy adherence.

1.1.618 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has demonstrable deficiencies that undermine effective public participation and thus the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place significant weight on the site-selection exercise; however, the quality of public involvement at both the plan and site-selection stages has been inadequate and persists into the current application phase. The application itself consists of many thousands of pages of technical documentation, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case comprehensively.

National policy guidance, including GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, requires that affected parties be afforded a realistic opportunity to engage with decisions of this magnitude. The circumstances under which the affected communities have been required to respond fall short of this standard. It is therefore incumbent upon the Scottish Ministers to give careful consideration to these procedural shortcomings when assessing the representations submitted.

The Environmental Impact Assessment (EIA) submitted with this application is insufficient for the Scottish Ministers to make an informed decision. While the

assessment is extensive in scope, it fails to adequately investigate identified pathways to significant effects. For instance, the landscape assessment applies a distance pattern not supported by its own methodology, the heritage assessment does not demonstrate adherence to its integrity test, and the socio-economic assessment lacks a place-based analysis of the affected islands. These deficiencies undermine the reliability of the conclusions reached.

Furthermore, the application depends in part on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties. However, reliance on these measures does not satisfy the EIA Regulations, which require that likely significant effects be understood and clearly evidenced prior to determination. Deferring resolution of key issues until after consent would be contrary to statutory requirements.

In light of these matters, the Scottish Ministers must base their decision solely on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted is adequate for that purpose. Therefore, the application should not be approved in its current form.

1.1.619 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment of visual and community impacts on Iona significantly underestimates their scale and importance, particularly when compared to established mitigation benchmarks. The Coastal Character assessment assigns the Sound of Iona a high sensitivity, noting its direct orientation towards the development area and extensive visibility. The scale of visual change is substantial, spanning approximately 21 kilometres with turbines covering about 39 degrees of the horizon. This magnitude of effect is classified as Moderate and Significant. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of

the island, including at Dùn Ì, the highest point. However, such recognition falls short of adequately addressing the depth of impact, especially given that familiar landmarks like Ben Hynish on Tiree, standing at 141 metres and visible from 33 kilometres, would be visually dominated by turbines extending roughly 194 metres at a closer distance of approximately two-thirds that range. This comparison underscores the disproportionate visual intrusion posed by the proposed development, which the applicant's own evaluation does not fully mitigate.

The heritage and community implications further reveal critical gaps in the assessment. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and high crosses, holds international significance, intrinsically linked to pilgrimage and sea arrival routes, as identified in the applicant's baseline studies. Despite Historic Environment Scotland's requests for additional viewpoints, including from the ferry crossing itself, the applicant has not provided visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby limiting the understanding of visual impacts on heritage assets. Moreover, community consultation on Iona indicates overwhelming opposition, with 92 per cent of households objecting to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the island's community, yet no assessment of this pathway has been undertaken. This omission further compromises the accuracy and completeness of the environmental and social impact evaluation, leading to an underrepresentation of the true scale and significance of effects on Iona.

The applicant's assessment fails to adequately address the practical consequences for the communities of Mull and Ross of Mull, particularly those whose livelihoods depend on tourism and the unspoiled coastal environment. Fionnphort, as the gateway to Iona and the primary embarkation point for visitors, is identified by the applicant as significantly affected, yet no tailored, place-specific mitigation or engagement appears to have been undertaken for this community directly bound to visitor flows. This omission risks undermining the economic and social fabric of a community reliant on tourism.

Moreover, while the applicant recognises significant effects on Core Paths and local landscape areas across Mull, including Central, South and West Mull, and the Loch na Keal National Scenic Area, these are attributed only Medium magnitude despite the acknowledged High sensitivity of these landscapes over distances ranging from 21 to 33 kilometres. The assessment's reliance on distance-based criteria, as exemplified by its treatment of the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, appears to underestimate the visual and experiential impacts on these highly valued and designated landscapes.

Finally, the importance of Mull's west-facing tourism economy and its associated wildlife boat operations, alongside the accommodation and support of western townships, is not adequately reflected in the assessment. These communities depend on the integrity of the Atlantic seascape, which the proposed development would industrialise, yet no place-based assessment or consideration of their specific economic and cultural reliance has been provided. This lack of detailed, localised

analysis undermines confidence that the significant visual, economic, and community impacts on these coastal areas have been properly understood or addressed.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Area, yet its conclusions understate the significance of these impacts. Ulva, a community-owned island at the outset of regeneration, shares fully in the effects on the National Scenic Area; its small, re-establishing community depends fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment has been undertaken for Ulva's unique circumstances. Staffa, situated approximately 35 kilometres from the development, lies beyond the 30-kilometre threshold recommended by NatureScot for assessing National Scenic Area qualities; notwithstanding the applicant's acceptance of the island's panoramic maritime qualities, it concludes that effects there would be small and not significant. Similarly, the Jura National Scenic Area, assessed at a distance of about 28 to 32 kilometres and of high sensitivity, is attributed only medium to low magnitude effects due to perceived mitigation by distance and retained landforms, despite its designation being founded on the wild and undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, is treated in the same manner. This approach collectively underestimates or omits significant effects on these important designated landscapes and fails to recognise the vulnerability of island communities such as Ulva, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment designates the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes a Low magnitude of change from the proposed development. This evaluation appears inconsistent when considering Tiree's distinctive physical and visual characteristics. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, presenting an open oceanic horizon that is integral to its sense of place. Introducing turbines up to 335 metres high would create vertical elements entirely unprecedented in the existing seascape. Given the prominence and scale of such structures against Tiree's flat and exposed environment, the Low magnitude classification significantly understates the potential visual and experiential impacts. This underestimation calls into question the reliability of the applicant's overall evaluation of effects on this sensitive and distinctive landscape.

While the applicant's assessment includes certain mitigation measures aimed at moderating the visual and economic impacts of the proposed development, these measures fall short in adequately addressing the effects experienced by mainland and island communities with direct seascape connections to the site. The reliance on distance-based moderation fails to capture the nuanced and significant influence the development would have on receptors such as Ardnamurchan Point, where panoramic views along the Hebridean seaboard contribute substantially to local tourism. The application's approach thus inadequately accounts for the high-quality seaward panoramas that are central to the visitor experience and economic vitality of the peninsula.

Moreover, the assessment omits a thorough examination of communities on the west coast of Kintyre, whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard. These communities, alongside the Treshnish Isles and other small islands and mainland coasts facing towards the development, rely heavily on the visual and environmental integrity of these waters. The lack of consideration given to these receptors undermines the comprehensiveness of the assessment and risks overlooking cumulative impacts that may affect the sustainability of local economies and the preservation of community identity.

In addition, the omission of any evaluation of effects on Gigha, a community-owned island that stands as a national symbol of island regeneration, is particularly concerning. Gigha's eastern outlook towards the development area means that its finely balanced community and economy could be materially affected. The failure to include Gigha in the applicant's assessment represents a significant gap, limiting the understanding of the full range of consequences and thereby weakening the robustness of the environmental appraisal. Consequently, the assessment should be revisited to incorporate these critical receptors to ensure a more comprehensive and equitable evaluation of the proposed development's impacts.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic moderation and discounting of impacts beyond approximately 20 kilometres. This methodology directly leads to the practical consequence that significant effects on highly sensitive receptors located beyond this arbitrary boundary are understated. Consequently, the communities residing in these areas have not been subject to detailed, place-specific assessment, leaving their exposure to adverse effects effectively unrecognised in the environmental impact evaluation.

This approach is exemplified by the pattern observed in the applicant's assessment, where any encounter with sensitive receptors beyond the 20-kilometre threshold is met with an automatic reduction in the magnitude of change and a corresponding downgrading of the overall effect. Such moderation is not justified by the evidence and results in the failure to capture the true scale of environmental impacts on these distant yet vulnerable communities. The absence of a tailored, place-based evaluation means that the assessment lacks the nuance required to understand and mitigate the specific consequences experienced by those living outside the immediate vicinity.

In light of this, the environmental impact assessment as presented is fundamentally compromised. The systematic underestimation of effects beyond 20 kilometres undermines the integrity and comprehensiveness of the assessment process, thereby diminishing confidence in its conclusions. For the assessment to be robust and credible, it must incorporate a more nuanced approach that recognises and thoroughly evaluates significant effects on sensitive receptors irrespective of their distance from the development site.

1.1.620 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant's own evaluation

acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 163
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables). I request that this objection be officially recorded, that I be recognised as an objector, and that I receive notification of the final decisions regarding these applications.

The project under consideration involves the construction of an offshore wind farm with an approximate capacity of 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area encompassing around 448 square kilometres. The proposed site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the grounds for objection in terms of planning and environmental considerations, framed within the applicable statutory and policy context governing the determination of these applications. It is important to emphasise that the onus is on the applicant to provide sufficient evidence to satisfy all relevant legal and policy tests. Objectors are not required to disprove the proposal but rather to highlight where the applicant has failed to meet this burden. In this instance, the applicant has not demonstrated compliance with these standards, and accordingly, the applications should be refused consent.

1.1.621 Legislative and Policy Framework

The marine licence application must be refused because it fails to comply with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions are legally required to be taken in accordance with the National Marine Plan unless other relevant considerations apply. This application has not demonstrated compliance with key General Policies that are integral to the statutory assessment process.

Specifically, the application does not satisfy the requirements of GEN 4 (Co-existence), which governs the need to ensure compatible use of marine resources; GEN 6 and paragraphs 4.22 to 4.23 concerning the protection of the Historic Environment; GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas; GEN 9 addressing Natural Heritage; GEN 13 and GEN 18 (Engagement), which require effective consultation and stakeholder involvement; GEN 19 and paragraph 4.81 mandating the use of Sound Evidence; and GEN 21 and paragraph 4.85 on the assessment of Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a fundamental deficiency in the application.

Moreover, where compliance with these statutory policies has not been established, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet these essential statutory and policy criteria means it cannot lawfully be approved.

In conclusion, the marine licence application does not comply with the Marine (Scotland) Act 2010 or the relevant provisions of Scotland's National Marine Plan. The identified failures and omissions in meeting the statutory policies require that the application be refused.

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal's environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the Islands (Scotland) Act 2018, which mandates that the interests of island communities be considered and given due weight in the decision-making process. This statutory requirement is not met, as the application lacks any substantive evidence that these interests have been properly assessed or integrated into the planning rationale.

The absence of such consideration constitutes a clear deficiency and omission in the proposal's supporting documentation. Given that the Act explicitly requires these factors to be addressed, the failure to do so represents a conflict with the applicable legal and policy framework. This procedural and evidential shortcoming undermines the legitimacy of the application and its conformity with statutory obligations.

In accordance with established guidance, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and where deficiencies or omissions are evident, these matters must weigh against the granting of consent. On this basis, the proposal should be refused.

1.1.622 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that are designed to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and other

nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, the proposal must be considered alongside Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3, which addresses biodiversity protection.

In the detailed assessment, it is evident that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. The evidence submitted also fails to show that the ecological tests required under the relevant policies can be met. Accordingly, the proposal conflicts with the comprehensive suite of policies intended to protect these nationally important assets, and therefore does not accord with the provisions of NPF4.

1.1.623 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet evidence indicates a clear pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This implicit distance-based moderation is corroborated by the applicant's own documents, which acknowledge that at viewing distances exceeding 30 kilometres, the scale of change is judged as small, and that High magnitude effects are confined to within about 20 kilometres, Medium effects between approximately 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the inputs to the protective assessments are systematically understated at precisely the distances where the most sensitive designated landscapes are located, undermining the reliability of the conclusions presented to the Scottish Ministers for their consent decision.

While mitigation measures are often presented through visualisation materials to demonstrate their effectiveness, it is important to recognise the inherent limitations of such evidence. NatureScot's visualisation guidance, which has been adopted by the applicant, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This means that any assessment based on these materials must consider that the impressions formed may not accurately reflect real-world experience. Furthermore, wireline drawings included within the same panoramic projections share these limitations; they are technical renderings embedded within the visualisation rather than independent tools that correct or enhance the photographic evidence. Therefore, reliance on these visual materials alone is insufficient to comprehensively assess visual impacts, and caution should be exercised in interpreting their significance within the planning evaluation.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The assessment concludes that the proposed development fails to comply with key planning policies designed to protect landscape and seascape interests. Specifically, the effects identified engage provisions within NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which set clear standards for safeguarding nationally important environments.

Moreover, the applicant has not adequately demonstrated that the scale of the acknowledged effects aligns with the methodology employed in their assessment. This lack of internal consistency undermines the credibility of their findings and weakens any argument that the proposal adheres to the relevant policy requirements. Without robust evidence, the claimed compliance remains unsubstantiated.

In light of these considerations, the proposal does not meet the necessary criteria for protecting nationally important landscapes and seascapes as mandated by the referenced policies. Consequently, it is concluded that permission should be refused on the grounds of non-compliance with these critical planning provisions.

1.1.624 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate that the integrity of setting for historic assets has been properly evaluated, undermining confidence in its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland’s established methodology—which mandates an evaluation of whether changes to setting affect its contribution to cultural significance and whether setting integrity is maintained—the assessment relies predominantly on descriptions of visual change rather than the required evaluative analysis. A Methodological Audit, conducted using the applicant’s own Appendix 14.3, reveals that while heritage attributes are identified and factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation are discussed, the critical step of assessing the integrity of setting in accordance with the accepted methodology is absent. This omission means that the conclusion asserting adequate retention of setting integrity is unsupported by the necessary methodological rigor, calling into question the reliability of the applicant’s heritage impact findings.

The applicant’s assessment acknowledges the cultural significance of the heritage assets primarily through qualities such as pilgrimage, arrival by sea, movement

within a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape. Notably, these attributes are experienced through dynamic movement rather than static viewpoints. While this recognition is a positive step towards understanding the heritage value, the assessment may not fully capture the experiential qualities that contribute to the broader cultural landscape.

Historic Environment Scotland, in their consultation responses included within the application, highlighted this potential shortcoming by requesting additional viewpoints. Their concern was that the current assessment might inadequately represent these wider qualities, which are essential to appreciating the heritage assets in their full context. This suggests a need for a more comprehensive approach that goes beyond fixed observation points to encompass the cultural narratives conveyed through movement and the relationships between elements in the landscape.

Given the importance of these experiential and relational qualities, it is essential that the assessment methodology and any proposed mitigation measures reflect this complexity. Without a thorough representation of the cultural landscape's dynamic nature, there is a risk that the heritage impacts may be underestimated. Therefore, further consideration should be given to incorporating these wider qualities to ensure that the cultural significance of the affected assets is fully and appropriately addressed.

The heritage impact conclusions presented rely heavily on the landscape assessment as their foundation. However, where the landscape effects have been understated, as identified previously, the subsequent heritage conclusions inevitably reflect that same understatement. This dependency calls into question the robustness of the heritage impact findings.

In essence, the credibility of the heritage assessment is compromised by the deficiencies in the landscape evaluation. Without an accurate and comprehensive appraisal of landscape effects, the heritage conclusions derived are not sufficiently reliable to inform decision-making. Therefore, the current heritage impact conclusions should be treated with caution given their reliance on a flawed landscape assessment.

The applicant's submission engages directly with National Planning Framework 4 (NPF4) Policy 7, specifically subsection (h) concerning scheduled monuments, as well as subsections (c) and (d) relating to the settings of heritage assets. This is further supported by compliance requirements under Policy GEN 6 and the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for the protection of internationally and nationally important cultural heritage assets and their settings within the planning process.

However, the application fails to satisfy these policy requirements. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of the identified heritage assets and their settings will be preserved. Moreover, the Scottish Ministers are not presented with the necessary assessment or conclusion to verify

that such protection will be achieved. This omission undermines the acceptability of the application, as it does not meet the established policy standards for heritage protection. Consequently, the proposal cannot be considered compliant with the relevant statutory and policy obligations designed to safeguard these important heritage assets.

1.1.625 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence underpins the local economy. These visitors are primarily attracted by the very qualities identified in the applicant's own baseline assessments: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Such attributes are not merely incidental but form the essential foundation of the visitor economy that sustains these communities.

Any alteration to these fundamental qualities would therefore have a direct and adverse impact on the economic base of the islands. This, in turn, threatens the viability of essential local services, the stability of resident populations, and the broader social sustainability of the communities themselves. The proposal, by jeopardising the key characteristics that draw visitors, risks undermining the long-term future of these island settlements.

The practical consequence of the applicant's inadequate assessment methodology is a significant risk that the specific impacts on island communities will be neither properly understood nor effectively mitigated. Although the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, no subsequent assessment of habitability was undertaken for the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed consideration of potential port communities but failing to undertake an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a finding that lacks empirical grounding.

This conclusion overlooks the distinctive economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies tend to be heavily concentrated in sectors that are particularly vulnerable to changes in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers heightens the community's vulnerability by deepening reliance on those qualities at risk. Without a place-based analysis, the claim of low sensitivity is not supported by evidence but instead rests on an unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's findings and calls into question the adequacy of any proposed measures to address potential adverse socio-economic impacts on island communities.

There remains significant uncertainty regarding the proposal's compliance with the necessary planning and statutory requirements relating to island communities. The

relevant policy framework, including GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. This proposal falls short of these standards.

The applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the comprehensive assessment required to understand fully the proposal's effects upon these communities. Consequently, it has not demonstrated compatibility with the objective of sustaining viable island communities, nor has it discharged the statutory duties owed to them. In light of these deficiencies, the proposal cannot be considered compliant with the established policy and statutory framework protecting island communities.

1.1.626 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over several decades. This large-scale intervention risks causing significant adverse effects due to the disturbance and potential damage to Priority Marine Features and Annex I habitats situated within the development area itself.

Moreover, the surrounding waters serve as important habitats for various protected species, including seabirds, marine mammals, and basking sharks. The presence of these species underscores the ecological value and vulnerability of the site, necessitating careful consideration of any impact arising from the project.

Given the established ecological importance and sensitivity of the location, it is imperative that any proposals fully account for the potential environmental consequences. Adequate safeguards and mitigation measures must be incorporated to prevent unacceptable harm to these priority habitats and protected species throughout the lifespan of the development.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments potentially affecting protected habitats and species can only be granted if it is conclusively demonstrated that the integrity of the protected site will not be adversely affected. This requirement mandates that no reasonable scientific doubt remains regarding the proposal's impact. The onus lies squarely with the applicant to provide robust evidence to satisfy this high standard. Importantly, mitigation, compensation measures, and proposals for future monitoring alone cannot substantiate compliance with the statutory tests. This rigorous approach is embedded not only in the Habitats Regulations but also reflected in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Collectively, these provisions ensure that environmental protection is paramount and that consent is withheld unless the legal and policy conditions are unequivocally met.

The practical consequence of the applicant's failure to satisfy the statutory tests is that the protection of internationally important habitats and species cannot be assured, which fundamentally undermines the justification for granting consent. Without clear demonstration that these legal requirements are met, the risk of harm to designated ecological features remains unacceptably high.

The evidence submitted, including the applicant's own derogation documents, reveals significant uncertainty regarding compliance with the necessary statutory criteria. This uncertainty indicates that the applicant has not provided sufficient assurance that the proposed development will avoid adverse impacts on protected habitats and species of international importance.

Given the applicant's inability to meet the statutory tests, it is clear that the application does not fulfil the legal obligations designed to safeguard critical ecological assets. Consequently, the case for granting consent is not made, and the application should be refused to ensure the continued protection of these internationally significant environmental features.

1.1.627 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment fails to provide a reliable account of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This undermines the ability of decision-makers to fully understand the scale and significance of the overall impact on the environment and local communities.

This unreliability stems from the cumulative assessments depending directly on conclusions drawn in the Environmental Impact Assessment (EIA), particularly those relating to landscape, heritage, and socio-economic factors. When these underlying assessments understate effects, as demonstrated elsewhere, the cumulative assessment necessarily begins from a diminished baseline. Consequently, the aggregated effects presented do not reflect the actual extent of harm or change that would result from the cumulative development scenario.

It follows that the cumulative impact assessment cannot be regarded as a sound basis for planning decisions. Without an accurate baseline, the combined effects of this proposal and other developments are consistently underestimated, risking inadequate mitigation and management measures. A thorough reassessment is essential to ensure that the cumulative impacts are fully and fairly evaluated in line with statutory requirements.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects have been comprehensively identified and assessed, in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed, leaving a gap in the decision-making process. It is therefore essential that the assessment of these deferred elements be clearly and explicitly considered before any determination is made.

1.1.628 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process, thereby rendering the quality of public participation in that process directly relevant. However, deficiencies in public involvement at both the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and specialist advice is least accessible. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case.

GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must have a realistic opportunity to participate. The conditions under which the affected communities have been required to respond do not meet this standard. It is therefore essential that Ministers take this shortfall firmly into account when considering the representations made, as the legitimacy of the site-selection process is undermined by these deficiencies in consultation timing and public participation.

1.1.629 Effects on Local Area

The applicant's assessment fails to adequately recognise and address the direct and significant impacts that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the nearest inhabited islands to the development site, which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay. Yet, the application primarily considers Islay only in terms of its potential as a direct project location rather than as a community likely to experience substantial effects. Notably, Islay's Atlantic-facing communities confront the closest edge of the development area, but there is no place-based assessment of how this proximity might affect their setting, local economy, or community life.

In relation to Colonsay and Oronsay, the seaward outlook, which is integral to daily life and identity, directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to an internationally protected seabird population associated with these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting insufficiently addressed. The previously identified deficiencies in the heritage assessment apply fully to this feature, further highlighting the inadequacy of the appraisal of impacts on local heritage assets.

Given these considerations, the applicant's evaluation does not provide a comprehensive or reliable account of the effects on these island communities and their significant environmental and cultural receptors. This underassessment risks overlooking adverse consequences that would be materially relevant to planning decisions, and as such, the assessment should be revisited to ensure that the impacts on Islay, Colonsay, and Oronsay are properly and fully accounted for.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant across approximately 21 kilometres, where turbines would span around 39 degrees of the horizon. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes significant effects upon residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts, particularly regarding the island's internationally important monastic heritage. The baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing—has not been fully addressed. Notably, no visualisation has been provided from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point integral to appreciating the heritage context.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect without subsequently undertaking an assessment of this impact. The scale of the turbines is also understated; for instance, Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—would be surpassed in height by the largest turbines by about 194 metres, despite the turbines being located at roughly two-thirds of that distance.

In summary, while the applicant recognises certain significant effects on Iona, the overall evaluation falls short in fully capturing the extent and depth of visual, community, and heritage impacts. This underestimation compromises the accuracy and reliability of the environmental and social impact appraisal for the island.

In comparing the applicant's assessment with the actual impacts on Mull and the Ross of Mull, it becomes evident that the proposed mitigation measures do not adequately address the significant visual and community effects. While the applicant acknowledges significant effects at locations such as Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital point for visitor embarkation—these admissions highlight only a portion of the wider impacts experienced by these coastal communities. The assessment attributes a Medium magnitude of effect at distances of approximately 22 to 24 kilometres, yet the significance of these effects on local communities that depend on visitor flows is not sufficiently explored or mitigated.

Moreover, across Mull itself, the applicant concedes significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly identified as having High sensitivity at distances ranging from 21 to 33 kilometres. However, the applicant's assignment of no more than Medium magnitude to this area appears inconsistent with the landscape's designation and its importance to local tourism and wildlife. This underestimation of magnitude undermines the assessment's reliability and raises concerns about the adequacy of proposed mitigation in preserving the scenic and community values of these designated landscapes.

Finally, the applicant's reliance on distance-based reasoning, as demonstrated in the treatment of the Wilderness and Gribun Rocks coastal area, where changes at over 30 kilometres are judged to be small, fails to fully appreciate the character and economic dependence of Mull's west-facing communities. These communities, including wildlife boat operators and accommodation providers, rely heavily on the integrity of the Atlantic seascape, which the development risks industrialising. Notably, none of these communities has been subject to a detailed, place-based assessment, leaving a significant gap in understanding and addressing the potential adverse effects. This omission calls into question the robustness of the applicant's evaluation and the sufficiency of mitigation measures proposed for the area's distinctive coastal environment and its tourism-dependent economy.

The applicant's assessment fails to fully recognise the significant effects on designated landscapes and island communities, thereby risking harm to their natural

and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is entirely subject to the same impacts identified for that landscape. As a small, re-establishing community reliant on its unspoilt seascape and setting for regeneration, the absence of any specific assessment for Ulva is a notable omission. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies some 35 kilometres from the development area—beyond the 30-kilometre assessment limit advised by NatureScot. Despite acknowledging its panoramic maritime qualities, the applicant concludes effects there would be small and not significant, a judgement that understates potential impacts. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic character, is assessed at a distance of around 28 to 32 kilometres with an assumed Medium to Low magnitude of effect based on distance and retained landforms; this moderation contrasts with the importance of its designation. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment approach. Collectively, these considerations suggest the applicant's evaluation underestimates or omits significant effects, undermining the proper protection of these sensitive seaboard landscapes and vulnerable island communities.

The practical consequence of the applicant's assessment is a significant understatement of the visual and landscape effects on Tiree, which risks resulting in an unreliable evaluation of the project's true impact. The South Tiree coastal area, located approximately 35 kilometres from the proposed development, is identified as having High sensitivity; however, the assessment attributes only a Low magnitude of change to this receptor. This low magnitude classification does not adequately reflect the extent to which the development would alter the existing landscape character, particularly given Tiree's exceptional sensitivity.

Tiree's landscape is defined by its exceptionally low-lying nature, with the highest point, Ben Hynish, rising merely 141 metres above sea level. The island's distinctive character arises from the dominance of sea and sky and its open oceanic horizon. Introducing turbines up to 335 metres in height would place vertical structures into the seascape that have no precedent on the island. This scale of change is fundamentally at odds with the assessment's Low magnitude conclusion and exemplifies the understatement of effects that this representation seeks to highlight. Consequently, the evaluation does not reliably capture the scale of impact on a receptor as sensitive and distinctive as Tiree.

While the applicant's assessment acknowledges certain visual impacts and proposes distance-based mitigation measures, these do not adequately address the effects experienced by mainland and island communities with direct views of the development. For example, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic seascapes along the Hebridean coast that attract visitors and support the local economy. The quality of these seaward panoramas is precisely the type of receptor for which the applicant's distance-based mitigation falls short, as it fails to consider the significance of such valued views in sustaining tourism and community identity.

Moreover, the assessment omits any examination of effects on the community-owned island of Gigha, whose residents' purchase of the island has become a

national symbol of island regeneration. Facing the development waters to the east, Gigha's delicate social and economic balance is vulnerable to unassessed impacts. Similarly, the chain of communities along the west coast of Kintyre, along with the Treshnish Isles and adjacent mainland coasts, rely heavily on the open Atlantic seascape that encompasses views towards Islay, Jura, and beyond. The absence of consideration for these interconnected seascape receptors compromises the comprehensiveness of the assessment and risks overlooking significant adverse effects on the character and economic resilience of these communities.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.630 Personal Observations

Based on my own local knowledge, I also wish to highlight that: This is so removed from the needs of those who live in the area, is unnecessary and represents a dysfunctional process.

Finally, I would also ask the Scottish Ministers to consider: The people you serve.

1.1.631 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, a detailed review of the applicant's submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted. Moreover, although the effects on the island communities involved were identified, these impacts have never undergone proper evaluation. The ecological assessments, which are essential to meet statutory tests, have not been

demonstrated to be capable of compliance. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow the substantive issues raised in this objection to be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address and state their conclusions on the effects of the proposal on cultural heritage and the island communities within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 164
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination regarding these applications.

The proposals involve the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres to blade tip. The site covers around 448 square kilometres of marine area situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated within the statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide compelling, sufficient evidence to meet the relevant statutory tests. Objectors are not obliged to demonstrate the contrary. In this instance, the applicant has failed to discharge that burden. Consequently, for the reasons elaborated below, I submit that consent should be refused.

1.1.632 Legislative and Policy Framework

The proposal fails to demonstrate compliance with multiple key policies of National Planning Framework 4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). As a significant material consideration, NPF4 must be applied alongside statutory duties and legislative requirements, yet the submitted evidence does not establish adherence to these policies. This failure to comply with essential policy provisions directly undermines the statutory and policy framework governing the determination of this application.

Moreover, the evidence identifies clear deficiencies and omissions in the proposal’s assessment and mitigation of impacts on biodiversity, natural places, historic assets, and energy considerations. Such shortcomings constitute conflicts with the applicable legal and policy framework. In accordance with established planning principles, where compliance has not been demonstrated or where conflicts arise, these matters weigh decisively against the granting of consent. Consequently, the proposal should be refused on the basis of its fundamental non-compliance with NPF4 and associated statutory requirements.

The application fails to comply with the statutory requirements for environmental impact assessment and habitats regulations assessment, rendering the determination of consent premature and unlawful. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent

marine works regulations, it is mandatory that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This procedural obligation ensures that decision-makers have a full understanding of the environmental consequences before granting consent. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not demonstrate compliance with these legal requirements. The absence of adequate environmental impact assessment and habitats regulations assessment constitutes a fundamental deficiency and omission in the application. As established in the approved evidence, where compliance has not been demonstrated or where evidence reveals such deficiencies or conflicts with the legal and policy framework, these matters must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of failure to satisfy the mandatory environmental assessment and habitats protection obligations.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. The evidence confirms that this statutory obligation is not merely procedural but substantive, requiring clear and demonstrable consideration within the planning assessment. The absence of such evidence in the application materials indicates a fundamental deficiency in addressing the statutory framework governing island communities.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. In this case, the failure to properly consider and weigh the interests of island communities constitutes a significant procedural and substantive omission. Consequently, the proposal is in conflict with the statutory requirements and should be refused on this basis.

1.1.633 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by the proposed development rely exceptionally heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are integral to the islands' appeal and underpin their visitor economy. Any alteration or degradation of these qualities would directly undermine the economic foundations of these communities. This, in turn, threatens the provision of local services, the retention of population, and ultimately the long-term viability of the islands as sustainable communities. The proposal thus poses a significant risk to the fundamental economic and social sustainability of the island communities by impacting the very characteristics that sustain their visitor-dependent economies.

1.1.634 Effects on Local Area

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the

accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

1.1.635 Personal Observations

In addition to the planning matters above, I am personally concerned because: The islands of the Hebrides are where the foundation of Christianity was established in the UK over 1500 years ago. This proposal would seriously impact the local community by destroying sites that the newly founded monastery considers sacred. Additionally eliminating the opportunity for pilgrims the world over will hurt the local economy by reducing tourism, which the communities depend upon.

1.1.636 Summary

The proposal for the MachairWind Offshore Wind Farm has not been adequately demonstrated by the applicant to comply with the relevant statutory and policy framework governing its determination. Notably, the applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area concerned. Examination of the applicant's published documents reveals that these impacts have been understated, with a crucial heritage assessment remaining incomplete. Furthermore, while the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. The applicant has also failed to satisfy the

necessary ecological tests, and it is important to highlight that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of additional environmental information and enhanced visual representations. It is further proposed that the determination of the applications be deferred until after a public inquiry, thereby enabling a thorough examination of the issues raised within this objection. Regardless of the final decision, it is also requested that the Scottish Ministers provide clear and explicit conclusions in their reasons concerning the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 165
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassing application 00012385 for consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind development. Please record this letter as an official objection, register me accordingly, and ensure I am informed of the outcome of the decision process.

The proposed development entails the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The scheme would include between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The designated Windfarm Development Area extends over roughly 448 square kilometres of marine space located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to other islands and coastal communities within the southern Hebrides.

My objection is grounded firmly in planning and environmental considerations, evaluated against the relevant statutory and policy frameworks that govern the determination of these applications. It is important to emphasise that the responsibility lies with the applicant to provide sufficient and compelling evidence to satisfy all applicable tests. Objectors are under no obligation to prove the contrary. Having reviewed the submissions and supporting documentation, I conclude that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for this development should be refused.

1.1.637 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal fully satisfies the impact criteria set out in NPF4 Policy 11, which governs support for renewable energy development. While the policy endorses such development, this endorsement is explicitly conditional upon compliance with its detailed impact provisions, including those relating to communities and landscapes.

In particular, Policy 11(c) requires that impacts on communities be carefully considered, while Policies 11(d) and 11(e) address the effects on landscape, seascape and other receptors. The evidence indicates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded from detrimental impacts.

Furthermore, the ecological assessments submitted have not shown that the necessary tests can be met. Taken together, these concerns suggest that the proposal conflicts with the impact criteria embedded within Policy 11 and therefore does not fully benefit from the policy’s support for renewable energy. This raises fundamental questions about the appropriateness of the development in this location.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, thereby failing to protect the qualities for which these areas have been designated. This outcome directly conflicts with Policy 11 and related provisions within NPF4, which are designed to safeguard the integrity and character of National Scenic Areas and other nationally important landscapes as outlined in Policy 4(c) and 4(d).

Furthermore, the submission does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. Policies 7, including 7(h), and 7(c) and 7(d), require clear evidence that such heritage assets will be protected from harm. The absence of such demonstration undermines compliance with the NPF4 framework intended to conserve these irreplaceable assets and their contextual environments.

In addition, the proposal lacks sufficient evidence to confirm that island communities would be safeguarded or that the necessary ecological tests under Policy 3 on biodiversity can be met. Without these assurances, the development cannot be considered consistent with the comprehensive protections afforded by NPF4. Consequently, the proposal fails to comply with multiple policies designed to protect designated assets, necessitating its refusal in order to uphold national planning objectives.

The proposal would result in significant adverse effects on the landscape, heritage, and community interests within the area governed by the Argyll and Bute Local Development Plan 2. These impacts are material to the terrestrial development plan framework and would undermine the objectives set out to protect these valued attributes. The extent of harm identified is sufficient to demonstrate clear conflict with the relevant policies that seek to safeguard the character and integrity of the local environment.

This incompatibility extends beyond the local development plan to the broader strategic context, including the National Planning Framework 4, which must be read as a whole. The proposal fails to align with the overarching national and local policy intentions, as it does not adequately address or mitigate the detrimental effects identified. The applicant has not provided evidence to demonstrate that these conflicts have been resolved or sufficiently mitigated, leaving the adverse impacts unaddressed.

In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework relevant to land-based effects, particularly the Argyll and Bute Local Development Plan 2. Given the quantified adverse impacts on landscape, heritage, and community interests, and the absence of any compelling justification or effective mitigation, the proposal should be refused planning permission on the basis of these policy conflicts.

1.1.638 Seascape, Landscape and Visual Effects

There remains considerable uncertainty regarding the full extent of the impact that the proposed development’s lighting will have on the night-time seascape character. At present, the sea horizon is unlit, and the introduction of aviation and navigation

lighting would represent a permanent alteration for the stated 35-year operational life. This change has yet to be fully assessed in terms of its visual and experiential effects, leaving unanswered questions about the degree to which the seascape's intrinsic qualities would be affected.

Moreover, the duration of 35 years should not be regarded as a straightforward limitation on the harm in policy terms. Consent for this development would effectively signify that the seascape is deemed suitable for wind farm use, setting a precedent for how this coastal environment is valued and protected. This policy implication underscores the importance of thoroughly understanding the long-term consequences before proceeding.

Given these points, it is essential that decision-makers approach the lighting effects on the night-time seascape with caution and seek further clarity. Only with a comprehensive evaluation can the balance between renewable energy objectives and seascape conservation be appropriately achieved.

The applicant acknowledges that the proposed development's effects engage several key policies, including NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, the applicant has not demonstrated that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Furthermore, there is a failure to show compliance with the policies designed to protect nationally important landscapes and seascapes. This lack of clear evidence and adherence to policy requirements indicates that the proposal does not meet the necessary standards set out for safeguarding these valued environmental interests.

1.1.639 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach necessitates more than a description of visual changes. It requires a thorough evaluation of whether alterations to setting affect the contribution that setting makes to the cultural significance of the asset, and crucially, whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be directly equated with adverse impact.

A published Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not demonstrate how the integrity of setting has been evaluated in accordance with the applicant's own adopted methodology. The assessment focuses on describing visual elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains intact. However, the essential evaluative step required by the methodology—demonstrating how these visual factors influence the cultural significance and integrity of setting—is

absent in all the examined worked examples. This omission calls into question the robustness of the assessment's findings.

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question is not solely derived from their physical presence but from a complex set of experiential qualities. These include elements such as pilgrimage routes, arrival by sea, the sense of movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Notably, these attributes are experienced dynamically through movement rather than static viewpoints, a factor that the applicant recognises in their baseline recording.

However, despite this recognition, the mitigation measures proposed appear insufficient to fully capture or preserve these broader cultural and experiential qualities. Historic Environment Scotland's consultation responses, as documented within the application, explicitly requested additional viewpoints to ensure that the assessment would adequately represent these wider landscape and seascape attributes. The absence of such comprehensive visual and experiential analysis potentially undermines the understanding of the heritage assets' significance and the effectiveness of the proposed mitigation. Consequently, there is a concern that the current assessment underrepresents the full cultural context and may not sufficiently safeguard the intangible qualities that contribute to the heritage assets' value.

The heritage impact conclusions rely substantially on the findings of the landscape assessment. However, as identified in the evidence, there is an understatement of landscape effects within that assessment. This understatement directly affects the heritage conclusions, causing them to inherit the same deficiencies. Consequently, the credibility of the heritage impact assessment is undermined by its dependence on a landscape analysis that does not fully capture the extent of landscape effects.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.640 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the islands. The applicant's own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands' populations. If the qualities that attract visitors are compromised, there is a real danger that the communities' ability to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, giving detailed consideration to potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

It is important to recognise that small island economies cannot be adequately represented by regional averages. Their economic structures are often concentrated in sectors that are directly vulnerable to alterations in the environmental and social qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers tends to deepen these communities' dependence on the qualities that may be at risk from the proposal. Therefore, concluding low sensitivity without a tailored place-based analysis does not constitute robust evidence but instead amounts to an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology appears fundamentally flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced, locality-specific approach is necessary to capture the true nature of potential effects and to inform appropriate planning decisions. Without this, the assessment risks overlooking significant socio-economic vulnerabilities inherent to these island settings.

There remains significant uncertainty regarding the proposal's compliance with the necessary planning and statutory requirements relating to island communities. The relevant policy framework, including GEN 19 and paragraph 4.81 of the National

Marine Plan, mandates that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. This proposal falls short of these standards.

The applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the comprehensive assessment required to understand fully the proposal's effects upon these communities. Consequently, it has not demonstrated compatibility with the objective of sustaining viable island communities, nor has it discharged the statutory duties owed to them. In light of these deficiencies, the proposal cannot be considered compliant with the established policy and statutory framework protecting island communities.

1.1.641 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the potential ecological impacts of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the site itself. These designated features are indicative of high environmental sensitivity and conservation value, suggesting that any disturbance could have significant consequences.

Furthermore, the surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks. The introduction of extensive construction, operation, and eventual decommissioning activities over several decades raises concerns about the cumulative effects on these protected species and their habitats.

Given the scale and duration of the proposal, it is imperative to carefully assess and mitigate potential adverse environmental effects. The ecological importance of the area necessitates a precautionary approach to ensure that the natural environment is safeguarded throughout the development lifecycle.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The very act of submitting these documents is a noteworthy element of the application. It indicates the applicant's recognition that, notwithstanding their own assessment, the Scottish Ministers might reach a different conclusion regarding the potential for adverse effects. Therefore, while these submissions demonstrate the applicant's intention to mitigate possible negative impacts through derogation and compensation measures, they also acknowledge uncertainty surrounding the assessment of harm to the protected site.

There remains significant uncertainty as to whether the statutory tests designed to protect internationally important habitats and species can be satisfied in this case. On the evidence submitted, including the applicant's own derogation documents and

the degree of certainty they reveal, it is clear that the applicant has not demonstrated compliance with these essential legal requirements. This fundamental failing undermines the justification for granting consent and must weigh heavily against the approval of the application.

1.1.642 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project's overall effects.

The cumulative impact assessments presented rely fundamentally on the conclusions drawn in other sections of the Environmental Impact Assessment. These underlying assessments of landscape, heritage, and socio-economic effects form the baseline from which cumulative impacts are evaluated. However, as previously demonstrated, these baseline assessments understate the true extent of the effects in each category.

Because the cumulative assessment is built upon these understated baselines, it inherently starts from a reduced point of reference. This methodological approach means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are likely to be significantly underestimated. The cumulative impact, therefore, does not accurately reflect the true scale or significance of the combined developments.

Given this reliance on flawed baseline assessments, the cumulative effects assessment cannot be regarded as reliable. It fails to provide a robust or comprehensive understanding of the overall impact, which calls into question the validity of the conclusions drawn regarding the proposal's cumulative environmental and socio-economic consequences.

The applicant's submission fails to comply with the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Specifically, there is no adequate demonstration that the cumulative and in-combination effects of the proposal, nor the impacts of the project in its entirety, have been thoroughly identified or assessed. Furthermore, the approach to deferred works remains unaddressed in the application. It is therefore essential that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory obligations.

1.1.643 Public Engagement, Site Selection and Environmental Information

The applicant urges Scottish Ministers to accord significant weight to the site-selection process, thereby making the quality of public participation within that process a matter of direct relevance. However, there have been notable deficiencies in public engagement not only during the plan and site-selection stages but persisting into the current application phase. The application itself comprises several thousand pages of highly technical documentation. Compounding this complexity, the consultation period has coincided with the busiest months of the year for island communities, a time when local residents are heavily engaged in continuous work throughout the visitor season. This period also represents when access to specialist advice is at its lowest, placing an additional burden on those seeking to engage meaningfully. In contrast, the applicant has had years to prepare, backed by substantial professional and financial resources, highlighting a significant imbalance in the ability to participate effectively.

The National Marine Plan's policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must be afforded a realistic opportunity to engage. Unfortunately, the conditions under which the affected communities have had to respond fall well short of these established standards. This deficiency undermines the legitimacy of the consultation process and, by extension, the robustness of the site-selection exercise that the applicant wishes to emphasise. It is therefore imperative that Ministers take these shortcomings into careful consideration when evaluating the representations submitted, recognising the serious implications for the fairness and inclusivity of the decision-making process.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.644 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment predominantly considers Islay in terms of its potential as a direct project location rather than as a distinct affected community. This approach fails to provide a place-

based evaluation of the development's effects on Islay's Atlantic-facing communities, whose daily lives and local economy would be directly influenced by the nearest edge of the development area. Consequently, the assessment does not adequately address the considerable and direct impact on the setting, community life, and economic activities of Islay's residents.

For Colonsay and Oronsay, the situation is equally concerning. The islands' seaward outlook, integral to their daily existence, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, which implicitly acknowledges that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, has an open maritime setting that the heritage assessment inadequately addresses, mirroring the gaps identified elsewhere in the application. Collectively, these shortcomings undermine the reliability of the environmental and heritage impact evaluation for Islay, Colonsay, and Oronsay, as the applicant's assessment does not sufficiently capture the direct and significant effects on these island communities, their economy, and their heritage assets.

The applicant's assessment of the visual and community impacts on Iona significantly underestimates the scale and importance of these effects, particularly when mitigation measures are considered. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity with direct orientation towards the development area and extensive visibility. It notes a large geographical extent of change, moderate and significant overall effects extending approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. While the applicant acknowledges significant effects for residents and visitors across much of Iona, including at Dùn Ì, the island's highest point, the assessment fails to fully capture the scale of visual intrusion. For context, the largest turbines would exceed the height of Ben Hynish on Tiree—141 metres high and visible from Iona at about 33 kilometres—by approximately 194 metres, despite being located closer at roughly two-thirds of that distance. This comparison emphasises the turbines' imposing presence and challenges the adequacy of the applicant's mitigation claims.

Beyond visual impacts, the heritage and community implications are equally significant and insufficiently addressed. Iona's internationally important monastic landscape, including the Abbey, Nunnery and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated locations like Càrn Cùl ri Èirinn above St Columba's Bay, remains unmet, leaving a critical gap in the visual impact appraisal. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, underscoring strong local opposition. Despite the applicant's recognition of habitability as a potential pathway of effect on the community, no formal assessment of this impact was undertaken. Taken together, these factors indicate that the applicant's evaluation inadequately reflects the profound visual, heritage and social consequences for Iona, thereby compromising the accuracy and robustness of the environmental and social impact appraisal.

The applicant's assessment recognises significant effects on several key areas of Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with a Medium magnitude of impact attributed. The assessment acknowledges significant effects at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the community serving as the gateway to Iona and the primary point of embarkation for visitors. This community is explicitly noted as being most directly linked to the flow of visitors, whose experience the applicant concedes would be significantly affected. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout, at viewing distances between approximately 21 and 33 kilometres, yet only a Medium magnitude of impact is attributed. This suggests an underestimation of potential visual and experiential effects in sensitive, designated landscapes.

A further concern arises from the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the assessment relies heavily on distance-based reasoning, concluding that due to viewing distances exceeding 30 kilometres, the scale of change is small. Such reasoning fails to fully account for the qualitative importance of these landscapes and their coastal character to the local communities and tourism economy. Mull's west-facing tourism sector, including wildlife boat operators and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessment has been undertaken for these communities, leaving a significant gap in understanding the cumulative visual, economic, and community impacts. This omission undermines the robustness of the applicant's conclusions and suggests the need for a more comprehensive and locally attuned evaluation of effects on Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment recognises effects on the Loch na Keal National Scenic Area, within which the island of Ulva is situated, acknowledging its designation and the shared landscape qualities at stake. Ulva is a community-owned island currently undergoing regeneration, characterised by a small, re-establishing population whose recovery depends fundamentally on the preservation of its unspoilt seascape and setting. However, no specific assessment has been undertaken regarding the impacts on Ulva's community or landscape qualities, representing a notable omission.

Similarly, the applicant addresses Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development. Despite Staffa's status as one of the most celebrated small islands in Europe and its acknowledged panoramic maritime qualities, the applicant concludes that effects at this distance would be small and not significant. This conclusion is drawn notwithstanding NatureScot's request to assess effects up to around 30 kilometres, implying that Staffa lies beyond the suggested assessment boundary, yet the importance of its seascape qualities may warrant closer consideration.

The Jura National Scenic Area, situated approximately 28 to 32 kilometres from the development, is described by the applicant as having high sensitivity. The magnitude of impact is assessed as medium to low, tempered by factors such as distance, scale, and retained landforms. Nonetheless, the designation of Jura hinges on its wild and undeveloped Atlantic character, which could be more vulnerable to change than the assessment suggests.

Lastly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances between 35 and 40 kilometres, receive a similar treatment in the assessment, with no indication of significant effects.

In summary, while the applicant's assessment identifies potential effects on several designated landscapes, it appears to underestimate or omit detailed consideration of impacts on vulnerable island communities such as Ulva and significant seascape qualities of celebrated islands like Staffa. The reliance on distance thresholds and assumptions of limited magnitude may inadequately reflect the sensitivity and value of these areas, thereby undermining the protection of their natural and cultural attributes.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite acknowledging its High sensitivity at a distance of approximately 35 kilometres. This conclusion contrasts sharply with the recognised sensitivity of the site, suggesting that the proposed mitigation measures or distance-related factors may have been overestimated in their effectiveness. When compared with other assessments where similar distances and sensitivities have resulted in higher magnitude ratings, this discrepancy indicates an inconsistency that undermines the reliability of the applicant's evaluation.

Tiree's unique topography and landscape character further challenge the Low magnitude conclusion. As an exceptionally low-lying island dominated by expansive sea and sky, its highest elevation, Ben Hynish, reaches only 141 metres. The introduction of turbines up to 335 metres tall would represent vertical structures unprecedented in the island's seascape. Such prominent features would inevitably alter the visual and experiential qualities that define Tiree's character. The assessment's failure to adequately reflect this substantial alteration leads to a significant understatement of potential effects.

In light of these considerations, the applicant's evaluation appears to underestimate the magnitude of change and consequent impacts on Tiree's sensitive and distinctive landscape. This understatement raises concerns about the overall reliability of the assessment, warranting a more thorough and calibrated appraisal to ensure that the full extent of effects on this exposed and valued receptor is properly recognised and addressed.

The applicant's assessment has not addressed the potential effects on several mainland and island communities that have direct views of the proposed development and depend economically on the seascape. Notably, Gigha, a community-owned island and a national symbol of island regeneration, faces the development area from the east. The impact on this finely balanced community and its economy remains unexplored. Similarly, Ardnamurchan Point, the most westerly

point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors to the entire peninsula. These seaward panoramas represent receptors of high sensitivity, yet the assessment applies distance-based moderation that diminishes the significance of such views without adequate justification. Furthermore, the west coast of Kintyre comprises a series of communities whose character and visitor economy are intrinsically linked to the open Atlantic seaboard looking towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts that share views of the development area are similarly omitted from a thorough evaluation. Given the omission of these key receptors, the assessment lacks comprehensiveness in addressing the full range of potential effects on communities with direct visual and economic ties to the seascape.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic moderation and discounting of impacts beyond approximately 20 kilometres. This methodology directly leads to the practical consequence that significant effects on highly sensitive receptors located beyond this arbitrary boundary are understated. Consequently, the communities residing in these areas have not been subject to detailed, place-specific assessment, leaving their exposure to adverse effects effectively unrecognised in the environmental impact evaluation.

This approach is exemplified by the pattern observed in the applicant's assessment, where any encounter with sensitive receptors beyond the 20-kilometre threshold is met with an automatic reduction in the magnitude of change and a corresponding downgrading of the overall effect. Such moderation is not justified by the evidence and results in the failure to capture the true scale of environmental impacts on these distant yet vulnerable communities. The absence of a tailored, place-based evaluation means that the assessment lacks the nuance required to understand and mitigate the specific consequences experienced by those living outside the immediate vicinity.

In light of this, the environmental impact assessment as presented is fundamentally compromised. The systematic underestimation of effects beyond 20 kilometres undermines the integrity and comprehensiveness of the assessment process, thereby diminishing confidence in its conclusions. For the assessment to be robust and credible, it must incorporate a more nuanced approach that recognises and thoroughly evaluates significant effects on sensitive receptors irrespective of their distance from the development site.

1.1.645 Personal Observations

In addition to the planning matters above, I am personally concerned because: It would spoil all personal memories and new visits to the area and would have a negative effect on the environment , the residents , the economy of the area

Based on my own local knowledge, I also wish to highlight that: All

1.1.646 Further Comments

The negative effect on the economy, the environment and the people of the islands

1.1.647 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 166
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposal, identified by application numbers 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables). Please register me as an objector and ensure I receive notification of the determination of these applications.

The development under consideration involves an offshore wind farm with an installed capacity of approximately 2 gigawatts. The project envisages between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a Windfarm Development Area spanning roughly 448 square kilometres of sea. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is proximate to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which are detailed below in the context of the statutory and policy framework governing the determination of these applications. It is important to emphasise that the onus lies squarely on the applicant to provide sufficient evidence demonstrating that all relevant legal and policy tests have been met. Objectors such as myself bear no obligation to prove the contrary. In my assessment, the applicant has failed to discharge this burden adequately. Consequently, the applications should be refused consent.

1.1.648 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria outlined in NPF4 Policy 11, resulting in significant adverse consequences for both the environment and local communities. Although Policy 11 supports renewable energy development, this support is conditional and must operate within the constraints of specific impact assessments, notably those addressing effects on communities, landscapes, seascapes, and other sensitive receptors.

In particular, the proposal would cause substantial harm to nationally designated landscapes and seascapes, undermining their protected status. Additionally, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has not been adequately addressed, raising concerns about the social implications of the development. Furthermore, the ecological assessments provided do not convincingly show that the necessary environmental tests can be met.

Given these unresolved issues, the proposal conflicts directly with the requirements of NPF4 Policy 11. It cannot be supported as it stands, since the adverse impacts on heritage, landscape, community, and ecology run counter to the policy’s intended balance between renewable energy advancement and environmental protection.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, failing to uphold the protections set out in Policy 11 alongside Policies 4(c) and 4(d) of NPF4, which safeguard National Scenic Areas and nationally important landscapes from such impacts. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, thereby conflicting with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding historic asset settings. The application also falls short of evidencing that island communities would be protected in accordance with the relevant provisions. Lastly, the ecological tests required under Policy 3 on biodiversity have not been shown to be satisfied based on the evidence submitted. Taken together, these failings establish that the proposal does not comply with multiple critical NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

1.1.649 Seascape, Landscape and Visual Effects

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual evidence provided. According to this guidance, printed visualisations cannot fully replicate the scale that a viewer experiences in the field. This acknowledgement underscores that such visual materials offer only an approximation of real-world perception rather than a precise or comprehensive representation.

Furthermore, wireline drawings included within the panoramic projections share these same constraints. As technical renderings embedded within the visualisations, they do not serve as independent correctives but rather reflect the limitations of the accompanying photographic images. Consequently, while these materials assist in understanding potential visual impacts, their interpretive value must be considered within the context of these acknowledged technical and perceptual shortcomings.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entirety of its 35-year operational life. This change would be readily apparent to observers and would mark a significant departure from the existing natural darkness of the maritime environment.

Importantly, the operational lifespan of the development does not mitigate the policy implications of this harm. Granting consent to this project would represent a clear policy decision that the affected seascape is deemed suitable for wind farm use, thereby endorsing the acceptability of such visual and lighting impacts in this location.

Given the lasting nature of these effects and their direct influence on the character of the night-time seascape, careful consideration must be given to whether the introduction of artificial lighting in this currently unlit marine setting is consistent with planning policies aimed at protecting seascape character. It is therefore essential that the significance of this impact is fully recognised in the decision-making process.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has not adequately demonstrated that its assessment of the scale of the accepted effects aligns consistently with its own stated methodology. This inconsistency raises doubts about the reliability of the conclusions presented and undermines confidence in the assessment's findings.

Moreover, the proposal fails to establish compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Given this lack of demonstrated conformity, it is evident that the proposal does not meet the requisite policy standards, and accordingly, it should not be supported.

1.1.650 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's assessment risks underrepresenting the true impact on heritage assets by not fully capturing the broader cultural landscape and experiential qualities that contribute to their significance. This practical shortcoming could lead to an incomplete understanding of how the proposal might affect the heritage environment, particularly in terms of the lived experience and cultural narrative that these assets embody.

According to the applicant's own baseline, the cultural significance of the affected heritage assets arises from an array of interrelated qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is not derived solely from isolated monuments or static viewpoints but from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape. The heritage value is experienced through movement across the site rather than from fixed vantage points, emphasizing the importance of an assessment approach that embraces this fluid and interconnected character.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application documentation, have explicitly requested the inclusion of

additional viewpoints to ensure that these wider experiential and cultural qualities are properly represented in the assessment. The absence of these viewpoints and the wider landscape context in the applicant's evaluation could therefore result in a constrained and insufficient appraisal of heritage impacts, undermining the robustness of the planning process and the protection of cultural heritage.

The mitigation measures proposed rely heavily on the landscape assessment to inform the heritage impact conclusions. However, where landscape effects have been understated, as previously detailed, the heritage conclusions that depend on this assessment inevitably inherit the same understatement. This reliance raises concerns about the robustness of the conclusions drawn regarding heritage impacts.

Given that the landscape assessment forms the foundation for understanding the visual and experiential context of the heritage assets, any deficiency in its analysis risks distorting the perceived severity of effects on those assets. If the landscape impacts are underestimated, it follows that the consequent heritage impacts may not be fully appreciated or appropriately mitigated.

Therefore, the credibility of the heritage conclusions is undermined by the shortcomings in the landscape assessment. This interdependency suggests that a more rigorous and transparent evaluation of landscape effects is necessary to ensure that heritage impacts are accurately identified and effectively addressed.

The application fails to demonstrate compliance with essential policy provisions designed to protect heritage assets, notably those set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers have not been presented with the necessary assessment to reach a reasoned conclusion on this matter. In light of this absence of demonstrable protection and assessment, the application does not meet key policy requirements for heritage protection and thus cannot be considered acceptable.

1.1.651 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

While the applicant's socio-economic assessment addresses regional port communities in detail, it notably omits a place-based evaluation of the island

communities directly affected by the proposal, despite their identification by the applicant's own consultants as potentially vulnerable through habitability impacts. The assessment's conclusion that these island communities exhibit low sensitivity to tourism effects rests on an examination conducted at a regional scale, rather than on an analysis tailored to the specific characteristics and conditions of the islands themselves. This approach overlooks the fact that small island economies are not simply regional averages; rather, they are often heavily reliant on sectors intricately linked to the attributes that attract visitors. Consequently, their economic reliance on increasing visitor numbers intensifies, rather than diminishes, their sensitivity to any changes affecting those qualities. Therefore, the conclusion of low sensitivity, reached without a dedicated, place-based assessment, cannot be considered evidence-based but must instead be regarded as an unsubstantiated assumption. This insufficiency in the assessment methodology undermines confidence in the applicant's understanding of potential impacts and the adequacy of proposed mitigation measures concerning the island communities.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.652 Ecology, Biodiversity and Habitats Regulations

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application therefore signals the recognition by the applicant of potential harmful impacts, while also presenting proposed mitigation measures intended to address these concerns.

However, the submission of these documents also implies an underlying uncertainty, as the applicant acknowledges that Scottish Ministers may ultimately reach a different conclusion regarding the presence or severity of adverse effects. This

acknowledgement underscores the need for careful scrutiny of the proposed compensation and derogation measures to ensure they are adequate and effective in safeguarding the protected guillemot population and the integrity of the designated site.

The applicant's evidence correctly highlights the stringent requirements set out under the Habitats Regulations, which stipulate that consent for developments affecting protected sites may only be granted if it is clearly ascertained that the proposal will not adversely affect the integrity of the site. This threshold is deliberately high, allowing consent only where no reasonable scientific doubt remains. It is important to note that this places the evidential burden firmly on the applicant, who must provide robust demonstration that the statutory tests are satisfied.

Moreover, reliance solely on mitigation, compensation measures, or future monitoring is insufficient to meet the legal standard. These measures can support a case but cannot independently establish that the proposal will not have an adverse effect. This interpretation is consistent with the requirements of the Habitats Regulations and is reinforced by relevant policy frameworks including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, they ensure that developments are subject to rigorous scrutiny before consent is granted.

While it is acknowledged that development can bring benefits, these must be balanced against the imperative to protect designated habitats. The high evidential standard ensures that environmental integrity is maintained and that statutory obligations are upheld. Therefore, any assessment of the proposal must carefully consider whether the applicant's evidence convincingly dispels reasonable scientific doubt regarding adverse effects before permission is granted.

The applicant's submissions fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. Despite the inclusion of derogation documents intended to support the case, these materials reveal an insufficient degree of certainty that the necessary legal safeguards can be met. This absence of clarity undermines the fundamental requirements imposed by relevant environmental legislation, which demand rigorous proof that adverse effects on protected ecological features will be avoided or adequately mitigated.

Given this evidential shortfall, the application cannot be regarded as satisfying the statutory criteria for consent. The failure to establish that the prescribed tests have been met calls into question the legitimacy of any grant of permission. In light of the above, the case for allowing the proposed development is significantly weakened, and refusal is warranted to ensure the protection of internationally important ecological assets.

1.1.653 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed as it fragments essential components, notably deferring the export cable corridor and onshore transmission works to separate applications. This segmentation precludes a comprehensive evaluation of the project's cumulative effects, as these critical

elements are not considered alongside the wind farm itself. Without assessing these interconnected parts together, it is impossible to fully understand the overall environmental and operational impacts, undermining effective mitigation and regulatory oversight.

This method conflicts with established legal principles, particularly the precedent set in Raeshaw Farms, which mandates that a project must be evaluated in its entirety rather than divided into smaller parts whose individual impacts may seem less significant. By salami-slicing the project, the assessment bypasses a holistic review, potentially allowing adverse effects to be overlooked until after the principal decision has been made. Such an approach is procedurally unsound and risks non-compliance with statutory requirements for comprehensive project appraisal.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. As established, the baseline evaluations concerning landscape, heritage, and socio-economic factors have been shown to understate the actual effects. Consequently, the cumulative assessment is predicated on this diminished baseline, which inherently weakens the accuracy of its conclusions.

Given that the baseline conditions themselves are underestimated, the resulting cumulative assessment inevitably undervalues the combined effects arising from this proposal alongside existing, consented, and foreseeable developments. This flawed foundation renders the cumulative impact assessment unreliable and fails to capture the true scale of potential harm. Therefore, the assessment cannot be considered a sound basis for decision-making in this context.

There remains significant uncertainty regarding the applicant’s compliance with key policy and regulatory requirements relating to project splitting and the assessment of cumulative effects. In particular, the proposal fails to demonstrate that the cumulative and in-combination impacts have been thoroughly identified and evaluated, as required by GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed within the application, leaving a gap in the understanding of the full scope and consequences of the project. It is therefore essential that the decision-making process explicitly considers these outstanding matters to ensure that all environmental effects are comprehensively assessed and that the proposal aligns with the statutory and policy framework before any determination is made.

1.1.654 Public Engagement, Site Selection and Environmental Information

The practical consequence of the insufficiency of the Environmental Impact Assessment (EIA) submitted is that the Scottish Ministers are unable to make a fully informed decision on the application. The EIA serves as the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. Across key topics, the application identifies potential significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate the conclusions reached. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written

methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals is inadequate, as the EIA Regulations require that likely significant effects are understood prior to determination. Consequently, the Scottish Ministers must base their decision on the evidence presently before them, not on the assumption that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information provided meets this requirement, rendering the EIA insufficient for the purpose of determination.

1.1.655 Effects on Local Area

While the applicant proposes mitigation and compensation measures aimed at protected species and heritage assets, these do not adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Islay and Colonsay, being the closest islands to the development area—which lies immediately north-west of Islay and west of Colonsay—are insufficiently assessed in the application. The assessment treats Islay primarily as a potential project location rather than recognising it as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay face the nearest edge of the 448 square kilometre development area, yet no place-based evaluation has been undertaken to consider the impacts on their setting, economy, or community life.

Furthermore, for Colonsay and Oronsay, the development directly confronts the seaward outlook that is integral to daily life. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This represents the clearest acknowledgement within the application that harm to the internationally protected seabird populations inhabiting these cliffs cannot be ruled out. In addition, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly regarding the treatment of its open maritime setting.

Taken together, these deficiencies demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary reliability and thoroughness, leaving the effects on these island communities and their valued assets underassessed and insufficiently mitigated.

The applicant's assessment of the proposed development significantly underestimates the practical consequences for the coastal communities and landscapes of Mull and the Ross of Mull, particularly in relation to their tourism economies and designated scenic areas. For example, Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors, is recognised by the applicant as experiencing significant effects. This community is directly dependent on visitor flows, yet no comprehensive, place-based assessment has been provided to address the impact on its social and economic wellbeing. Similarly, the Core Paths of the Ross of Mull and areas such as Erraid are acknowledged to be

significantly affected, yet these impacts are not fully accounted for in terms of their implications for local residents and visitors alike.

Across Mull, the applicant admits to significant effects on Core Paths and withins the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres. Despite this, the magnitude of impact is only rated as Medium, a conclusion that appears inconsistent with the recognised importance of this landscape. The applicant's reliance on distance-based criteria to diminish the perceived scale of change, as seen in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further exemplifies the inadequacy of the assessment. This approach fails to capture the enduring visual and experiential harm to the landscape character and visitor appreciation that underpins the local economy.

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers in the western townships, fundamentally depends on the intactness and natural quality of the Atlantic seascape. The proposed development would industrialise this environment, yet none of these communities has been subject to a detailed, place-specific evaluation of the consequential effects. This omission undermines confidence that the applicant has fully understood or mitigated the potential for significant adverse impacts on a vital part of Mull's economy and community identity. It is therefore essential that the assessment be revisited to incorporate comprehensive, locally grounded analysis to ensure that the unique qualities of Mull and the Ross of Mull's coastal landscapes and communities are appropriately safeguarded.

The applicant's assessment of impacts on designated landscapes beyond the immediate development area appears to underestimate the significance of effects when compared to established mitigation thresholds. For instance, although NatureScot requested assessment of effects on National Scenic Area (NSA) qualities up to approximately 30 kilometres, the applicant considers the effect on Staffa—one of Europe's most celebrated small islands located about 35 kilometres away—as small and not significant, despite acknowledging its panoramic maritime qualities. Similarly, the Jura NSA, designated for its wild and undeveloped Atlantic character, is assessed at around 28 to 32 kilometres with a High sensitivity rating but assigned only a Medium to Low magnitude of effect, justified by distance and retained landforms. This approach also extends to the Scarba, Lunga and the Garvellachs NSA, situated roughly 35 to 40 kilometres from the site, where comparable moderate effects are assumed.

Moreover, the assessment fails to consider Ulva, an island within the Loch na Keal NSA that shares the full effects on that designated landscape. Ulva is a community-owned island at the early stages of regeneration, dependent on the unspoilt seascape qualities that are at risk. The absence of any dedicated assessment of Ulva's recovery prospects and its reliance on the setting's natural and cultural attributes represents a significant omission.

Taken together, these points indicate that the applicant's evaluation does not fully capture the extent or the importance of potential impacts on wider seaboard

designated landscapes and vulnerable island communities. This shortfall undermines the robust protection of their natural and cultural qualities that the designations seek to ensure.

The applicant's assessment assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change from the proposed development. This juxtaposition of high sensitivity with minimal change appears inconsistent when considering the specific characteristics of Tiree's landscape.

Tiree is an exceptionally low-lying island, with its highest elevation at Ben Hynish reaching only 141 metres. Its landscape character is fundamentally shaped by the dominance of the sea and sky, offering an open oceanic horizon that is currently free from vertical structures of significant scale. The introduction of turbines reaching up to 335 metres would represent unprecedented vertical intrusions within this seascape. Consequently, the applicant's Low magnitude conclusion underrepresents the true extent of visual and character impacts on this highly sensitive receptor, rendering the overall evaluation unreliable.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate visual and economic effects on surrounding communities. However, this approach does not adequately address the unique circumstances of certain mainland and island locations with direct views of the development. For instance, Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters directly to the east, yet the applicant has failed to examine the potential impacts on its delicate social and economic fabric.

Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation claims are applied, yet the assessment does not sufficiently consider how the development might alter this important visual amenity and its associated visitor economy.

Furthermore, the chain of communities along the west coast of Kintyre, whose identity and tourism rely heavily on the open Atlantic seaboard views towards Islay, Jura, and beyond, are equally disregarded. The Treshnish Isles and other small islands with similar outlooks also share this vulnerability. In sum, the applicant's assessment lacks a comprehensive evaluation of these sensitive receptors, thereby undermining confidence in its conclusions and the effectiveness of proposed mitigation measures.

The applicant's assessment systematically reduces the significance of environmental effects on highly sensitive receptors located beyond approximately 20 kilometres by moderating the magnitude of change and discounting the resultant impact. This approach results in a complete absence of place-specific evaluation for the communities affected at these distances. Such systematic underestimation undermines the integrity of the environmental impact assessment, as it fails to adequately recognise and address the genuine effects experienced by these distant yet sensitive receptors. Consequently, the assessment cannot be regarded as

comprehensive or robust in its appraisal of impacts beyond the 20-kilometre threshold.

1.1.656 Personal Observations

In addition to the planning matters above, I am personally concerned because: I rely on the local communities when I visit and I worry that this type of development will cause people to move away from the area. Part of the attraction of this area to visitors like myself are the marine wildlife and the scenery.. this proposal would put tourists off visiting the area.

Based on my own local knowledge, I also wish to highlight that: Basking sharks and other marine mammals draw visitors to the area. There is insufficient information about how migratory routes might be affected.
Seabirds such as guillemots and puffins also draw tourists and there is insufficient information about how their migration and breeding will be affected

Finally, I would also ask the Scottish Ministers to consider: It is really important to understand the impact on seabirds, whales and sharks - many species that are slowly recovering from the brink of extinction - this proposal will reverse this trend

1.1.657 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While effects on the island communities affected by the project were identified, they were never subjected to proper assessment. Ecological requirements, as prescribed by relevant tests, have not been shown to be achievable. Additionally, the application before the Scottish Ministers includes only a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers consider not refusing the application outright, I request that further environmental information be sought and that enhanced visualisations be provided. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing thorough examination of the issues raised in this objection. Regardless of the decision taken, I also request that the Ministers explicitly address and state their conclusions regarding the effects on cultural heritage and on the impacted island communities within their reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 167
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, comprising applications 00012385 and 00012386. These seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited (ScottishPower Renewables). I request that this submission be recorded as an official objection, that I be registered accordingly, and that I am informed of the final determinations made on these applications.

The development in question involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning around 448 square kilometres. This site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the southern Hebrides islands and their coastal communities.

The following exposition details the grounds for objection, rooted firmly in the statutory and policy context governing the determination of these applications. It is incumbent upon the applicant to substantiate, through robust and comprehensive evidence, that all relevant statutory tests and planning policies are met. The onus does not lie with objectors to disprove the application. In this instance, the applicant has failed to meet that evidential burden, and accordingly, consent should be withheld.

1.1.658 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to define a distance threshold beyond which major effects cease, yet their own analysis reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of sensitivity or visibility. This is evident in the applicant’s documentation, which notes that for a coastal area over 30 kilometres away, the scale of change is judged small due to viewing distance, and the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective tests rely on inputs that systematically moderate magnitude at precisely the distances where the most sensitive designated landscapes are situated. This undermines the reliability of the conclusions presented to the Scottish Ministers, as the true effects on these landscapes are likely understated.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot’s visualisation guidance, which the applicant has adopted, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers must exercise

caution when interpreting these images, as they may underestimate or misjudge the development's visual presence within the landscape.

Furthermore, the wireline drawings included within the panoramic projections share the same inherent limitations as the accompanying photographic images. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to the photographs. Consequently, they do not overcome the fundamental constraints of the visual materials and cannot be relied upon to provide a fully accurate or objective representation of the proposed development's appearance. This recognition tempers the confidence that can be placed in the visual evidence as a comprehensive tool for assessing visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the intended 35-year operational lifespan. This change is significant as it transforms an existing natural and unlit maritime environment into one marked by artificial lighting, with clear implications for the visual qualities and experiential value of the seascape after dark. Furthermore, the applicant's assessment rightly notes that the 35-year operational period does not diminish the policy significance of this harm. Granting consent for the development effectively signals that this particular seascape is considered appropriate for wind farm use despite the adverse impact on its night-time character. This carries considerable weight in planning terms, as it establishes a precedent regarding the acceptability of lighting effects on seascape character within the policy framework. Consequently, the introduction of permanent aviation and navigation lighting must be carefully weighed against policy objectives aimed at conserving the natural qualities of the seascape, recognising that harm arising from such lighting is enduring and materially alters the night-time environment.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The effects identified engage several provisions, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Critically, the applicant has failed to demonstrate that its conclusions about the scale of these acknowledged effects align with its own assessment methodology. Moreover, no satisfactory evidence has been provided to confirm that the proposal complies with policies aimed at protecting nationally important landscapes and seascapes. On this basis, it cannot be concluded that the proposal meets the necessary policy requirements.

1.1.659 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets is intrinsically linked to experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance arises from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape, which are fundamentally experienced through movement rather than static viewpoints. Such recognition

underscores the importance of evaluating heritage impacts within the context of the broader cultural landscape and the lived experience it offers.

Nevertheless, Historic Environment Scotland's consultation responses, as documented in the application, highlight a concern that the applicant's assessment may not fully capture these wider qualities. In particular, they requested additional viewpoints to ensure that the comprehensive cultural and experiential dimensions are properly represented. This suggests that the current assessment framework may inadequately reflect the full baseline qualities, thereby limiting the robustness of heritage impact evaluation. Addressing this gap is essential to accurately appraise the significance and potential effects on the heritage assets in their cultural context.

1.1.660 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

The proposal fails to meet essential planning and statutory standards concerning the protection and assessment of island communities, resulting in a significant shortfall in compliance that undermines the decision-making process. National Marine Plan

policy GEN 19 and paragraph 4.81 explicitly require that decisions affecting marine and island environments be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is incomplete or uncertain. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and appropriately weigh the interests of island communities, ensuring meaningful engagement from the earliest stages through to the conclusion of the planning process.

In this case, the applicant has acknowledged the necessity of particular scrutiny for island communities but has failed to conduct the requisite assessment to understand the proposal's potential effects on them. There is a notable absence of evidence demonstrating compatibility with the sustainability of these communities, nor is there any indication that the statutory duties owed to island populations have been satisfactorily fulfilled. This omission contravenes both policy and legislative requirements, leaving the interests of island communities insufficiently considered and inadequately protected.

In conclusion, the proposal does not comply with the relevant planning policies or statutory obligations relating to island communities. The lack of a thorough assessment and meaningful engagement means that the proposal cannot be regarded as compatible with the principles of sustainable development for island communities, nor can it be approved without rectifying these fundamental deficiencies.

1.1.661 Ecology, Biodiversity and Habitats Regulations

The proposed development area encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and importance. Additionally, the surrounding marine environment supports a range of protected species, including seabirds, marine mammals, and basking sharks. Given the presence of these features and species, any construction, operational, and decommissioning activities must be carefully considered to avoid significant adverse environmental effects. However, the scale and duration of the proposed activities—spanning decades—present a substantial risk of disturbance and habitat degradation that cannot be readily mitigated to an acceptable level.

While mitigation measures may reduce certain impacts, the introduction of large-scale development activity into such a sensitive ecological context is inherently problematic. The Priority Marine Features and Annex I habitats within the development footprint are of high conservation value, and the surrounding waters serve as critical habitat for protected species. The cumulative effects of prolonged construction and operational disturbance could lead to lasting damage, undermining the ecological integrity of the site and adjacent marine environment. Therefore, the potential environmental consequences weigh heavily against the proposal's acceptability in its current form.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant indicates an acknowledgment that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot

population. Such documents are typically prepared when it cannot be ruled out that the integrity of a protected site might be compromised. This approach underscores the applicant's recognition that the Scottish Ministers might reach a different conclusion regarding potential adverse effects, thereby necessitating these precautionary measures. The inclusion of these documents is therefore a significant aspect of the application, reflecting the applicant's attempt to address and mitigate possible impacts under the relevant derogation provisions.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.662 Cumulative and In-Combination Effects

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true

scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

1.1.663 Public Engagement, Site Selection and Environmental Information

The applicant invites Scottish Ministers to attribute significant weight to the site-selection process; however, this process has been fundamentally compromised by deficiencies in public participation. The consultation accompanying the application encompasses many thousands of pages of highly technical material, yet the consultation period coincided with the busiest months for island communities. During this peak visitor season, residents are engaged in continuous work, and access to specialist advice is severely limited. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources. This imbalance has effectively restricted the capacity of the affected communities to engage meaningfully with the proposals.

National policy and international principles underscore the necessity for effective public participation in decisions of such magnitude. GEN 18 of the National Marine Plan, alongside the Aarhus Convention's requirements, mandates that those impacted must have a realistic and fair opportunity to contribute to the decision-making process. The conditions under which the local communities have been expected to respond fall short of this standard, undermining the legitimacy of the consultation. It is therefore imperative that Ministers recognise these shortcomings in participation when considering the representations submitted, as the quality and timing of public engagement bear directly on the integrity of the entire site-selection process.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment's conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant's dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.664 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development,

which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the development area spanning approximately 21 kilometres and turbines extending across about 39 degrees of the horizon. This results in a moderate and significant overall effect that directly affects the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, Nunnery, and high crosses, is central to its cultural significance. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional visual viewpoints—specifically from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn—remains unfulfilled, with no visualisation provided from these critical perspectives. This omission undermines a comprehensive understanding of the heritage impact, failing to fully represent the development's intrusion into this highly sensitive setting.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's consultants did not assess habitability, despite identifying it as a potential pathway of effect. The perceived scale of the turbines can be better appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would exceed Ben Hynish by around 194 metres while situated at roughly two-thirds of that distance, highlighting the disproportionate visual intrusion. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the true extent of impacts on Iona, warranting a more rigorous and comprehensive reassessment.

The applicant's assessment recognises significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is rated as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—being identified as the community most directly affected by changes to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas are acknowledged. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity across distances ranging from approximately 21 to 33 kilometres, though the applicant attributes this only a Medium magnitude of effect.

However, the applicant's reliance on viewing distance as a primary determinant of impact magnitude results in a notably limited appraisal of certain areas. For example, the Wilderness and Gribun Rocks coastal area is judged to experience a small scale of change due to its viewing distance exceeding 30 kilometres, reflecting a distance-based reasoning that fails to capture the true extent of impact. Crucially, the assessment does not provide place-based evaluations for Mull's west-facing tourism economy, wildlife boat operations, or the accommodation sectors of its western townships, all of which depend intrinsically on the Atlantic seascape that the proposed development would industrialise. This omission neglects the significant visual, economic, and community effects on these tourism-dependent communities and their surrounding designated landscapes, undermining the comprehensiveness of the applicant's impact assessment.

The applicant's assessment acknowledges the proximity of Ulva within the Loch na Keal National Scenic Area and recognises the shared effects on that designated landscape. However, it fails to consider the specific circumstances of Ulva as a community-owned island undergoing regeneration. This small, re-establishing community depends fundamentally on the unspoilt qualities of its setting and seascape, yet no dedicated assessment has been made to evaluate the potential impacts on its natural and cultural environment.

Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed as experiencing only small-scale change with no significant effect. This conclusion is reached despite the island's renowned panoramic maritime qualities, which the applicant's own assessment acknowledges. Notably, this distance exceeds the approximately 30-kilometre threshold recommended by NatureScot for assessing impacts on National Scenic Area qualities, raising concerns about the adequacy of the assessment methodology.

Other designated landscapes such as the Jura National Scenic Area, situated about 28 to 32 kilometres away, are assessed as having High sensitivity but only Medium to Low magnitude of impact, primarily justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga, and the Garvellachs National Scenic Area at 35 to 40 kilometres. However, these areas' designations rest heavily on their wild and undeveloped Atlantic character, which may be more vulnerable to change than the applicant's assessment suggests. Taken together, these

considerations indicate that the potential effects on important seaboard landscapes and island communities may be underestimated, warranting a more thorough and nuanced evaluation.

The applicant's assessment that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape within the development's vicinity. For example, Gigha, a community-owned island whose acquisition by its residents has become emblematic of island regeneration, faces the development waters from the east. The potential impacts on Gigha's finely balanced community and economy have not been examined, leaving a gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptors affected by the distance-based moderation approach critiqued in this objection. The failure to assess effects on this important coastal vantage point undermines the robustness of the applicant's evaluation.

Moreover, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts with views toward the development area, share a similar exposure. The absence of any assessment of impacts on these interconnected communities and seascapes further compromises the completeness of the applicant's environmental considerations.

The applicant's assessment systematically moderates and discounts the magnitude of change affecting highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of environmental

effects on these receptors, as the assessment reduces the perceived significance of impacts solely based on distance. Such a methodology fails to account adequately for the true extent of change experienced by these communities.

Consequently, the effect on populations living beyond this arbitrary threshold remains insufficiently evaluated. These communities, which bear the consequences of the development, have received no place-based assessment to reflect their specific circumstances and sensitivities. This omission undermines the thoroughness and accuracy expected in a robust environmental impact assessment.

In summary, the applicant's distance-based approach compromises the integrity of the assessment by systematically discounting effects beyond 20 kilometres without proper justification. For the assessment to be comprehensive and reliable, it must address the significant impacts on all sensitive receptors irrespective of distance, ensuring that all affected communities are properly considered.

1.1.665 Summary

The proposal put forward by the applicant fails to meet the requirements set by the relevant statutory and policy framework governing its determination. Notably, the applicant's own evaluations acknowledge substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Additionally, a comprehensive heritage assessment, as mandated, has not been undertaken. While the adverse effects on the island communities directly affected by the development were identified, no formal assessment of these impacts has been conducted. Furthermore, the ecological criteria necessary for approval have not been demonstrated to be achievable. Compounding these concerns is the fact that only a portion of the proposed project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, as well as to decline the associated marine licence application.

Should the Ministers be inclined to grant consent, I request that additional environmental information be provided alongside enhanced visual representations. Moreover, I propose that the determination of these applications be deferred until a public inquiry has been convened, allowing for a thorough examination of all issues raised in this objection. Regardless of the final decision, I also implore the Ministers to include clear conclusions in their reasoning with respect to the impacts on cultural heritage and the island communities affected by the development.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 168
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) concerning the MachairWind Offshore Wind Farm, which is the subject of application numbers 00012385 and 00012386. Application 00012385 requests consent under section 36 of the Electricity Act 1989, while application 00012386 seeks a marine licence in accordance with Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be treated officially as an objection, that I be recorded as an objector, and that I receive notification of the decisions reached on these applications.

The proposed development involves establishing an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would comprise between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to the blade tip. The site encompasses a Windfarm Development Area of around 448 square kilometres, situated north-west of the Isle of Islay and west of Colonsay. Its location is roughly 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the planning and environmental grounds supporting my objection. These considerations are framed within the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to provide adequate evidence demonstrating that all relevant statutory tests and policy requirements have been met. Those opposing the development are not obliged to establish contrary proof. In this instance, the applicant has failed to meet this evidential burden, and for the reasons detailed below, consent ought to be refused.

1.1.666 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet an independent Evidence Note reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or extent of visibility. This pattern is corroborated by the applicant’s own documents, which acknowledge the influence of distance on their judgements—for example, an area over 30 kilometres away is assessed as experiencing only a small scale of change due to viewing distance. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes means that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not provide a reliable description of the effects that Scottish Ministers are being asked to consent to.

The visual materials submitted in support of the assessment inherently limit the ability to accurately convey the scale and impact of the proposed development as experienced on site. NatureScot’s visualisation guidance, which the applicant

follows, explicitly acknowledges that printed visualisations cannot fully replicate the scale a viewer perceives in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent means of correcting or enhancing perceptual accuracy. Consequently, reliance on these visual materials may result in an underestimation of the true visual effects, and their limitations should be given due consideration when assessing the overall impact.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently devoid of any artificial illumination, thereby permanently altering the character of the night-time seascape throughout its stated 35-year operational lifespan. This change represents a significant departure from the existing conditions, where the absence of lighting contributes to the natural and unspoiled visual quality of the marine environment after dark.

Furthermore, this operational timeframe does not mitigate the policy implications of the harm caused. Granting consent for this development effectively constitutes an acknowledgment that the seascape in question is appropriate for wind farm use, with all the attendant visual impacts that such use entails. Therefore, the decision carries substantial weight in shaping the future character and management of the night-time seascape, beyond the immediate term of the development's operation.

The applicant acknowledges that the proposed development would give rise to certain effects which engage the provisions of National Planning Framework 4 (NPF4), specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, despite recognising these effects, the applicant has failed to demonstrate that its conclusions regarding the scale of such effects are consistent with the methodology it employed. Crucially, there has been no satisfactory demonstration of compliance with the policies that safeguard nationally important landscapes and seascapes. This omission undermines confidence that the proposal adequately addresses the statutory requirements set out to protect these sensitive environmental assets. Consequently, the proposal does not meet the requirements of the relevant planning policies designed to protect landscape and seascape interests.

1.1.667 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a significant uncertainty regarding the true impact of the proposals on the setting of historic assets. Although the applicant states that they have applied Historic Environment Scotland's recognised methodology, the essential evaluative process required to determine whether the integrity of setting is maintained has not been demonstrated. Without this key step, the conclusions drawn about heritage impacts lack the necessary evidential foundation and cannot be relied upon with confidence.

Historic Environment Scotland's methodology, developed through extensive consultation, explicitly requires an assessment that goes beyond mere description of visual changes. It mandates a focused evaluation of how any changes affect the contribution that setting makes to the cultural significance of the heritage assets, with

particular attention to whether the integrity of that setting is adequately retained. The methodology also clarifies that visual change alone should not be equated directly with adverse impact, emphasising the need for a nuanced and reasoned judgement.

However, a detailed Methodological Audit, which reviewed the applicant's own Appendix 14.3, found that the assessment primarily describes factors such as visibility, distance, and screening, before making an unsubstantiated conclusion that the integrity of setting remains intact. This audit highlights that the crucial evaluative step prescribed by the methodology is absent from the applicant's assessment and its worked examples. Consequently, the reliability of the assessment's conclusions is fundamentally undermined, and the heritage impacts remain insufficiently justified.

The practical consequence of the applicant's approach is that the assessment risks underrepresenting the full extent of the cultural significance associated with the heritage assets. The baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements emphasise experiential connections formed through travel and interaction with the landscape, rather than static views. Consequently, an assessment focusing primarily on fixed viewpoints may fail to capture the nuanced relationships between monuments, spirituality, and the surrounding land and seascape that contribute to the heritage assets' value.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this concern by requesting additional viewpoints to better represent these wider cultural qualities. This suggests that the applicant's existing assessment framework may not fully address the complex, experiential nature of the cultural landscape. To ensure an accurate and comprehensive understanding of heritage impacts, it is essential that the assessment incorporates these broader perspectives, reflecting the interconnected and dynamic character of the affected heritage assets.

When comparing mitigation measures, it is important to recognise that the robustness of heritage impact conclusions is closely tied to the accuracy of the underlying landscape assessment. The effectiveness of proposed mitigation depends fundamentally on a clear understanding of the landscape effects, which in turn inform the heritage evaluation. If landscape effects are not fully accounted for, mitigation strategies may be insufficient or misdirected, thereby compromising their intended outcomes.

The assessment evidence demonstrates that the heritage conclusions are derived from the landscape assessment. As such, any understatement of landscape effects directly affects the credibility of the heritage impact findings. Specifically, where landscape effects have been downplayed or inadequately considered, the heritage conclusions constructed upon these findings inevitably inherit the same degree of understatement. This linkage creates a chain of uncertainty that weakens confidence in the overall evaluation process.

Consequently, reliance on a landscape assessment that understates effects undermines the foundation upon which heritage impact conclusions rest. For a comprehensive and reliable appraisal, it is imperative that the landscape assessment

accurately reflects the true extent of effects. Without this, the heritage conclusions cannot be regarded as fully credible, and the justification for mitigation measures remains questionable.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.668 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal's effect on the qualities that draw visitors must be considered with the utmost seriousness.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 adopts a regional approach, focusing in detail on potential port communities while neglecting a comparable, place-based evaluation of the island communities directly facing the development. This regional-level assessment nonetheless concludes that these island communities possess low sensitivity to tourism effects.

Such a conclusion warrants scrutiny, as small island economies differ markedly from regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the qualities attracting visitors. Moreover, their reliance on increasing visitor numbers does not mitigate this vulnerability; rather, it intensifies dependence on the very qualities that the proposal risks altering. Therefore, the conclusion of low sensitivity—arrived at without a place-based

analysis—is not substantiated by evidence but constitutes an assumption. Consequently, the socio-economic assessment methodology employed is flawed and insufficient to adequately understand or mitigate the potential impacts on island communities.

The applicant's evidence acknowledges that island communities necessitate particular scrutiny in the planning process, yet it concedes a failure to undertake the comprehensive assessment required to understand the proposal's effects upon these communities. This omission is significant given that the decision-making framework engages GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence. Where such evidence is lacking, a precautionary approach is explicitly required. Moreover, the proposal must accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which impose a statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the earliest stages to the conclusion of the decision-making process.

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.669 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. The proposed project would entail construction, operation, and decommissioning activities on a very large scale, persisting over several decades, thereby introducing significant and prolonged disturbance to this ecologically sensitive environment.

Given the presence of these designated and protected marine features and species, the proposal raises considerable concerns regarding its potential to cause substantial adverse environmental effects. The ecological importance and sensitivity of the site and surrounding waters necessitate rigorous assessment to ensure that the integrity of these habitats and species populations is maintained.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation efforts, aiming to address potential adverse effects on a protected site. Their presence in the application suggests that the applicant acknowledges the possibility of significant impacts and has sought to propose measures intended to offset them.

However, it is important to note that such derogation and compensation documents are typically prepared for circumstances where an adverse effect on site integrity cannot be ruled out. The mere submission of these plans reflects a recognition that the applicant's assessment does not definitively exclude harm to the protected population. This introduces a degree of uncertainty regarding the effectiveness of the proposed mitigation measures and whether they will fully prevent negative consequences.

Furthermore, the applicant's approach implies that the final determination on potential adverse effects rests with the Scottish Ministers, who may arrive at a different conclusion. Consequently, while the submitted documents demonstrate a willingness to engage with the derogation process, this does not guarantee that the proposals will satisfy the necessary statutory tests or that the protected site's integrity will be maintained. It remains essential that these considerations are given due weight in the planning decision.

The applicant evidence establishes that under the Habitats Regulations, consent for developments impacting protected habitats and species may only be granted where the competent authority is satisfied that the proposal will not adversely affect the integrity of the protected site, except where the stringent derogation tests are met. This legal framework requires that no reasonable scientific doubt remains regarding the absence of adverse effects. The onus lies firmly with the applicant to demonstrate compliance; reliance solely on mitigation, compensation measures, or future monitoring does not suffice to meet the statutory requirements.

This rigorous evidential standard is reinforced through the engagement of the Habitats Regulations alongside GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these provisions form a comprehensive policy framework that mandates a high threshold of proof before consent can be lawfully granted. Consequently, any planning decision must ensure that the statutory tests are fully satisfied in order to uphold the integrity of protected sites and comply with prevailing legal and policy obligations.

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.670 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant

elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The proposed cumulative impact assessment fails to provide a reliable evaluation, as it relies on baseline assessments that understate the true effects. Specifically, the Environmental Impact Assessment's underlying evaluations of landscape, heritage, and socio-economic factors have already minimized the extent of adverse impacts. Consequently, the cumulative assessment, which is based on these same understated baselines, inevitably underestimates the combined effects of this development alongside other existing, consented, and foreseeable projects. This systemic flaw compromises the accuracy of the overall cumulative impact conclusions, rendering them insufficient for informed decision-making.

The assessment identifies a clear shortfall in compliance with established planning policies and environmental regulations concerning project splitting and cumulative effects. Specifically, the applicant has failed to satisfactorily demonstrate that the cumulative and in-combination impacts of the proposal, including the effects of the project as a whole, have been reliably identified and assessed. This omission engages key provisions such as GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements set out in the Environmental Impact Assessment Regulations.

Given this context, it is essential that the decision-making process explicitly addresses the treatment of deferred works. Without a comprehensive evaluation of these components, the assessment remains incomplete and risks underestimating the true environmental consequences of the development. The absence of such consideration undermines the integrity of the planning review and the ability to fully comply with the legislative framework.

In conclusion, I respectfully request that the determination expressly considers the deferred works and ensures that the cumulative and in-combination effects are thoroughly and transparently evaluated. This approach is necessary to uphold policy compliance and to facilitate an informed and responsible planning decision.

1.1.671 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan

and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.672 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any

place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island's setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility spanning approximately 21 kilometres. This results in a Moderate and Significant overall effect, with turbines occupying around 39 degrees of the horizon. The West Coast of Iona is similarly identified as highly sensitive, with widespread visibility acknowledged by the applicant, who also accepts that significant effects would arise for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Furthermore, the monastic landscape of Iona—comprising the Abbey, the Nunnery and the high crosses—is internationally significant heritage. The applicant's baseline acknowledges the importance of pilgrimage, arrival by sea, and movement through the landscape to this heritage value. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself, yet the applicant failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thus limiting the thoroughness of the visual impact appraisal.

Beyond the formal assessments, community response further highlights the scale of concern. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—the applicant's own consultants identify it as a potential pathway of effect on the community—was never properly assessed. To illustrate the scale of the turbines' visual dominance, the largest turbines would surpass Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by around 194 metres at roughly two-thirds of that distance. This comparison underscores the likely overwhelming presence of the turbines on the landscape from Iona's vantage points. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and completeness of the environmental and social impact evaluation.

While the applicant acknowledges significant effects on certain areas and communities within Mull and Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort—the latter being a critical gateway for visitors to Iona—their assessment relies heavily on distance-based mitigation assumptions that warrant

closer scrutiny. For example, the Ross of Mull South coastal area is rightly identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed as Medium magnitude. However, the applicant's acceptance of significant effects in these zones contrasts with the treatment of more distant areas such as the Wilderness and Gribun Rocks coastal area, where, despite the High sensitivity classification of the Loch na Keal National Scenic Area (spanning 21 to 33 kilometres), the magnitude of effect is judged to be no more than Medium. This approach underplays the cumulative and perceptual impacts on the wider landscape.

Moreover, the applicant's assessment omits place-based analysis for communities that rely heavily on the unspoiled Atlantic seascape, including those dependent on the west-facing tourism economy, wildlife boat operations, and accommodation services in the western townships of Mull. The proposed development's industrialisation of this seascape threatens to undermine the natural qualities upon which these communities depend, yet they are not explicitly evaluated within the assessment. The reliance on viewing distance as a primary determinant of impact magnitude fails to capture the nuanced economic and social dependencies tied to these landscapes and seascapes.

In conclusion, while some mitigation is acknowledged by the applicant, the assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent communities. The approach, focused on distance-based reasoning, does not sufficiently reflect the sensitivities or the interlinked nature of these coastal environments and their associated human activities.

The applicant's assessment appears to underestimate or omit significant effects on several important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. While some mitigation measures are proposed, a detailed comparison reveals shortcomings in addressing the specific sensitivities and contexts of these areas. Ulva, for example, lies within the Loch na Keal National Scenic Area and is a community-owned island at the beginning of its regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting, yet no assessment has been made of the effects on Ulva, despite it sharing in full the impacts on the wider National Scenic Area. This omission is particularly concerning given the community's dependence on the qualities at stake. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite recognising the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's international importance. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only medium to low magnitude effects, with this moderation explained by distance, apparent scale, and retained landforms. However, this assessment seems to overlook the fundamental basis of Jura's designation, which rests on the wild, undeveloped character of its Atlantic outlook—precisely the quality potentially compromised by the development. A similar approach is taken to the Scarba, Lunga

and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, which also receives a comparable assessment. Taken together, these assessments suggest a pattern of underestimation or insufficient consideration of significant effects on designated landscapes and island communities, particularly where their defining qualities are dependent on unspoilt seascapes and remoteness. In conclusion, the applicant's approach does not fully acknowledge or mitigate the likely impacts on these sensitive areas, thereby risking harm to their natural and cultural attributes that warrant stronger protection.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes that the magnitude of change would be Low. This juxtaposition forms the basis of concern regarding the reliability of the evaluation. Given the acknowledged sensitivity of the landscape, it is critical that the magnitude of change is thoroughly appraised to reflect the true scale of impact.

Tiree's landscape character is exceptionally distinctive due to its low-lying nature, with its defining features being the dominance of sea and sky. The highest point on the island, Ben Hynish, rises only to 141 metres, which underscores the island's openness and exposure to its oceanic horizon. The introduction of turbines reaching heights of up to 335 metres would constitute vertical structures entirely unprecedented within this seascape. Such an alteration inevitably implies a significant visual and experiential change, which the applicant's Low magnitude classification fails to adequately acknowledge.

Consequently, the Low magnitude conclusion for such a sensitive receptor exemplifies the understatement identified in this objection. The assessment appears to underestimate the scale and significance of the turbines' visual and landscape effects on Tiree. This underestimation undermines the reliability of the evaluation and suggests that the true magnitude of change and impact on Tiree's sensitive and distinctive landscape character has not been fully recognised.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate the visual and economic impacts of the development on surrounding communities. However, this approach fails to account adequately for the significance of the seascape to those communities whose identity and livelihood are intimately connected to these views. For instance, Ardnamurchan Point, as the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. The application's reliance on distance as a mitigating factor overlooks the quality and importance of these seaward panoramas, which are precisely the receptors to which such moderation is inappropriately applied.

Moreover, several mainland and island communities with direct outlooks to the development area have been omitted from any meaningful assessment of potential effects. Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet the applicant has not examined how the proposal might disrupt this finely balanced community and its economy. Similarly, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on the open Atlantic seaboard views towards Islay, Jura,

and beyond, along with the Treshnish Isles and other small islands, share a common reliance on these seascapes. Their omission from the assessment compromises the comprehensiveness of the environmental and socio-economic evaluation, undermining confidence in the conclusions drawn by the applicant.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.673 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited Iona from Australia 3 times. It is a place of historical significance, peace and natural beauty. When this rare balance is disrupted you will lose something that has been cherished by people from around the world.

Based on my own local knowledge, I also wish to highlight that: The sea surrounding Iona is not only home to abundant marine animals and birds, it is also a place of outstanding natural beauty. How does a wind farm fit this picture?

Finally, I would also ask the Scottish Ministers to consider: Please listen to the local Iona community and those who love this precious area from around the world. Our numbers are small but our message is clear. This island and surrounding area is unlike any other. My favourite saying about Iona is " Iona is as it was." Time has stood still in this beautiful place. The veil between the past and present is incredibly thin. Turn your attention to the future. What price are you prepared to pay for another wind farm? The Vikings themselves couldn't even have caused this level of destruction.

1.1.674 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes as well as on the heritage and communities along this coastal region. Moreover, independent

reviews of the submitted documentation reveal that the magnitude of these impacts has been underestimated, and the necessary heritage assessments have not been conducted. Although the detrimental effects on the island communities involved were identified, they remain unassessed. Additionally, the ecological criteria essential for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the overall project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to decline consent for the MachairWind Offshore Wind Farm and to refuse the accompanying marine licence. Should the Ministers be inclined to grant consent, I request that they require the provision of further environmental information and enhanced visual representations. Furthermore, I recommend that determination of the applications be deferred until after a public inquiry, thereby ensuring a thorough examination of the concerns outlined in this objection. Regardless of the outcome, I also seek a clear and explicit statement within the Ministers' decision explaining their conclusions regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 169
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), pertain to the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning some 448 square kilometres of marine environment north-west of Islay and west of Colonsay. This location lies around 21 kilometres from Iona and is proximate to the islands and coastal communities of the southern Hebrides.

I request that this letter be recognised as a formal objection, that I be duly registered as an objector, and that I receive notification of the decision regarding these applications.

The objections detailed herein are grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing such proposals. It is imperative to note that the onus of proof lies squarely with the applicant. The applicant must provide sufficient evidence to satisfy all applicable tests and requirements. Objectors bear no responsibility to substantiate the contrary. Upon careful evaluation of the information submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications ought to be refused consent for the reasons elaborated in the subsequent sections.

1.1.675 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a clear distance threshold for ceasing major effects, yet evidence indicates that no highly sensitive receptor beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of sensitivity or visibility. Their own documents acknowledge distance as a key factor: areas over 30 kilometres away are judged to experience only small-scale change, with high magnitude effects confined to within about 20 kilometres, medium effects between 20 and 30 kilometres, and low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes are located results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

The applicant’s visual evidence is prepared in accordance with NatureScot’s visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

While mitigation measures may address some visual impacts of the proposed development during daylight hours, they do not extend to the introduction of aviation and navigation lighting on a currently unlit sea horizon. This permanent alteration of the night-time seascape character would endure throughout the stated 35-year operational life, fundamentally changing an environment that presently experiences no such illumination.

Moreover, the temporal limitation of 35 years does not diminish the policy implications of consenting to this development. Approving the project effectively signals that the seascape in question is appropriate for wind farm use, setting a precedent that may influence future decisions and the long-term character of the area. Consequently, the impact of night-time lighting warrants careful consideration in the planning balance.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.676 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the applicant’s adherence to the established methodology for assessing effects on the setting of historic assets, which calls into question the reliability of their conclusions about heritage impacts. While the applicant states that they have adopted Historic Environment Scotland’s recognised methodology—developed through consultation and requiring an evaluation of how changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—this process is not clearly demonstrated. The methodology explicitly cautions against equating visual change directly with adverse impact. However, a published Methodological Audit, based solely on the applicant’s Appendix 14.3, identifies that although the assessment acknowledges relevant heritage attributes and describes visual factors

such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to show how the integrity of setting has been evaluated in line with the accepted methodology. Crucially, the necessary evaluative step that distinguishes mere description from a robust assessment of integrity is absent across all examined examples. This omission undermines confidence in the assessment's conclusions that the integrity of setting is adequately retained.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

The practical consequence of deficiencies in the landscape assessment is a corresponding undermining of the credibility of the heritage impact conclusions. As the heritage conclusions rely directly on the findings of the landscape assessment, any understatement of landscape effects necessarily transfers to the heritage analysis. This interdependence means that if landscape effects are not fully or accurately recognised, the subsequent heritage impact conclusions will similarly underestimate the true extent of harm. Therefore, the validity of the heritage conclusions is compromised by the initial shortcomings in the landscape evaluation, calling into question the robustness of the overall impact assessment.

The application fails to demonstrate compliance with essential policy provisions designed to protect heritage assets, notably those set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers have not been presented with the necessary assessment to reach a reasoned conclusion on this matter. In light of this absence of demonstrable protection and assessment, the application does not meet key policy requirements for heritage protection and thus cannot be considered acceptable.

1.1.677 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining

attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal's effect on the qualities that draw visitors must be considered with the utmost seriousness.

The practical consequence of the applicant's flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant's own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission, the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors. The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it neglects the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, it does not adhere to NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and appropriately weighted through meaningful engagement from the outset to the conclusion of the planning process.

Crucially, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the potential effects of the proposal on these communities. This omission represents a

significant shortcoming in demonstrating that the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities have been fulfilled.

In conclusion, given the lack of adequate assessment and meaningful engagement with island communities as required by relevant policies and statutory frameworks, the proposal does not meet established planning and legal standards. Therefore, it cannot be considered compliant with the requirements designed to protect and support sustainable island communities.

1.1.678 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant’s approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant’s recognition of ecological sensitivities and the need for compensatory measures.

Mitigation, compensation proposals, and future monitoring, while important considerations, do not in themselves satisfy the rigorous evidential requirements mandated by the Habitats Regulations. Consent for developments affecting protected habitats may only be lawfully granted when it is ascertained beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high standard places the burden squarely on the applicant to demonstrate unequivocally that statutory tests are met, and mere reliance on mitigation measures cannot substitute for the necessary certainty demanded by law.

This stringent legal framework is reinforced through multiple policy instruments, including the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan,

and National Planning Framework 4 Policies 3, 4(b), 4(e), and 4(f). Together, they impose a strict control regime to ensure that any consent granted aligns with these protective requirements. Consequently, decision-makers must be satisfied that no reasonable scientific doubt remains before granting consent, thereby upholding the integrity of protected sites and adhering to established national policy standards.

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.679 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the proposed development, explicitly excluding the export cable corridor and the onshore transmission works that are essential for the wind farm's operation. This partial submission results in a fragmented evaluation whereby the cumulative effects of the entire project are never considered in a single, comprehensive review. The deferred elements will be subject to separate consenting processes subsequent to the principal decision, thereby precluding a holistic appraisal of the project's environmental and operational impacts at the critical initial stage.

Such an approach is fundamentally at odds with established legal principles, notably those upheld by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than segmented into smaller components with individually diminished apparent effects. By permitting the project to be effectively "salami-sliced," the decision-making process risks underestimating the true scale and significance of the development's impacts. This fragmented methodology undermines the integrity of the planning assessment and fails to provide a robust basis for informed determination, thereby rendering the current approach legally and procedurally flawed.

The assessment of cumulative effects within the Environmental Impact Assessment relies fundamentally on the baseline conditions established by preceding landscape, heritage, and socio-economic evaluations. However, these foundational assessments have been demonstrated to understate the true extent of impacts, leading to an initial baseline that is artificially diminished. Consequently, any cumulative impact analysis that builds upon this flawed baseline inherently inherits these inaccuracies, resulting in a systematic underestimation of the combined effects when the current proposal is considered alongside existing, consented, and foreseeable developments.

This methodological shortcoming undermines the reliability of the cumulative impact conclusions, as the starting point fails to reflect the genuine environmental and social context. The understated baseline reduces the perceived significance of incremental changes, thereby masking the full extent of potential harm. Without an accurate and robust baseline, the cumulative assessment cannot provide a dependable account of

the total effects, which is critical for informed decision-making and effective mitigation planning. It follows that the current cumulative impact assessment cannot be regarded as sufficiently comprehensive or trustworthy in its present form.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.680 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; however, this process has been fundamentally undermined by deficiencies in public participation that have persisted through to the application stage. The application consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is severely limited. In contrast, the applicant has had years, alongside substantial professional and financial resources, to prepare its case. The principles set out in GEN 18 of the National Marine Plan, alongside the requirements of effective public participation embodied in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage in decisions of this magnitude. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are respectfully urged to consider this shortfall carefully when weighing the representations made.

The Environmental Impact Assessment (EIA) submitted as part of this application constitutes the primary evidential foundation upon which the Scottish Ministers must base their determination. However, it is imperative to note that the critical consideration is not the extent or breadth of the EIA but rather its sufficiency in enabling a fully informed decision. Within the range of topics examined, the application identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. Notably, the landscape assessment presents conclusions that adhere to a distance-based pattern, yet this pattern is not supported by the methodology explicitly set out within the same assessment. Similarly, the heritage assessment does not adequately demonstrate that it has applied its own prescribed integrity test, thereby undermining the reliability of its findings. Furthermore, the socio-economic assessment lacks a focused, place-based analysis of the islands likely to be affected, which is a critical omission given the localised nature of socio-economic impacts in such contexts.

Moreover, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals is problematic. Such dependencies do not absolve the requirement, as stipulated by the EIA Regulations, that likely significant effects must be clearly understood prior to the determination of the

application. The Scottish Ministers are obliged to make decisions based on the evidence before them at the time of determination, rather than on the presumption that outstanding issues will be adequately resolved at a later stage. In this case, the applicant has not demonstrated that the environmental information currently submitted meets the requisite standards of adequacy. Consequently, the information provided is insufficient to support a properly informed decision by the Scottish Ministers.

1.1.681 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island's setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

The applicant's assessment significantly underestimates the scale and significance of visual and community impacts on Iona, leading to an incomplete understanding of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The turbines would be visible from approximately 21 kilometres away, spanning around 39 degrees of the horizon, thereby affecting the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. Despite this recognition, the assessment omits a comprehensive evaluation of habitability impacts on the local community, a pathway identified by the applicant's own consultants, even though a household consultation revealed that 92 per cent of respondents on Iona object to the proposal.

Moreover, the proposal's impact on Iona's internationally important monastic landscape is inadequately addressed. The applicant's baseline recognises the

significance of pilgrimage, arrival by sea, and movement through the landscape as critical to the heritage value of sites such as the Abbey, the Nunnery, and the high crosses. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. To contextualise the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres—by around 194 metres, despite being viewed from roughly two-thirds of that distance. This comparison further emphasises that the applicant's assessment fails to fully capture the extent and significance of the visual and heritage effects on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and community impacts on Mull and the Ross of Mull coastal areas, which are integral to the region's tourism economy. The Ross of Mull South coastal area, recognised for its High sensitivity at distances of 22 to 24 kilometres, is attributed only a Medium magnitude of effect, despite the applicant accepting significant impacts at Erraid and on the Core Paths of the Ross. Notably, Fionnphort, the gateway to Iona and primary embarkation point for visitors, is acknowledged as experiencing significant effects, yet the broader community implications bound to the flow of visitors remain inadequately addressed. Similarly, across Mull, significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, a designation of High sensitivity at approximately 21 to 33 kilometres, is attributed no more than Medium magnitude. This disparity suggests a disconnect between recognised sensitivity and the scale of attributed effects, potentially diminishing the perceived impact on these tourism-dependent communities and landscapes.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's reliance on viewing distance—over 30 kilometres—is used to justify judging the scale of change as small. This distance-based reasoning fails to adequately reflect the qualitative and economic significance of the landscape, particularly given the dependence of Mull's west-facing tourism economy on the Atlantic seascape. Wildlife boat operations and the accommodation infrastructure supporting western townships would be affected by the industrialisation of these seascapes, yet none of these communities have been afforded a place-based assessment. This omission undermines a comprehensive understanding of the development's impact, risking adverse consequences for both the landscape character and the economic vitality of these coastal communities.

The applicant's assessment significantly underestimates the impacts on important designated landscapes and vulnerable island communities, leading to inadequate protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a small, re-establishing community whose recovery critically depends on the unspoilt seascape and setting at risk; yet, no assessment of effects on Ulva has been made. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most

celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite acknowledging the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a judgement that appears to downplay potential harm. The Jura National Scenic Area, assessed as having high sensitivity at a distance of 28 to 32 kilometres, is attributed only medium to low magnitude effects, justified by distance and retained landforms, even though its designation is founded on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is subject to a similar assessment approach. Taken together, these assessments fail to adequately reflect the significance of effects on these designated landscapes and island communities, thereby undermining the safeguards necessary to maintain their distinctive natural and cultural attributes.

The applicant's assessment acknowledges the South Tiree coastal area as possessing High sensitivity at an approximate distance of 35 kilometres from the proposed development, yet paradoxically attributes a Low magnitude of change to this receptor. This juxtaposition is critical because it directly informs the overall evaluation of landscape effects. The designation of High sensitivity reflects the acknowledged vulnerability and distinctive qualities of this part of Tiree's coastline, which underpins the landscape's character and the community's connection to place. However, the Low magnitude rating appears incongruous with the acknowledged sensitivity and the scale of the proposed turbines, suggesting a significant understatement in the assessment's appraisal of impact severity.

Tiree itself is characterised as an exceptionally low-lying island, with a landscape defined predominantly by the interplay of sea and sky, and the absence of substantial vertical features. The island's highest point, Ben Hynish, reaches only 141 metres, and the open oceanic horizon forms an integral aspect of its distinctive landscape character. The introduction of turbines up to 335 metres tall would represent unprecedented vertical structures within this seascape, dramatically altering the visual composition and experiential qualities of the area. Given such a profound potential change, the conclusion of Low magnitude for this receptor does not reliably reflect the true scale of impact. This discrepancy leads to an evaluation of effects on Tiree's sensitive and distinctive landscape character that is insufficiently robust, undermining confidence in the overall conclusions drawn in the assessment.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape impacted by the proposed development. This omission undermines the comprehensiveness of the environmental appraisal and risks overlooking adverse consequences for populations reliant on the coastal environment.

Gigha, a community-owned island celebrated nationally for its regeneration, faces the development site from the east. The finely balanced community and its economy, which depend substantially on the surrounding waters, have not been examined within the assessment. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the

receptors affected by the distance-based moderation approach contested in this representation.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are defined by the open Atlantic seaboard views towards Islay, Jura, and adjacent waters, share comparable exposure. The Treshnish Isles and other small islands and mainland coasts with outlooks toward the development area are equally disregarded. Such omissions from the assessment leave a critical gap in understanding the full scope of the development's effects and should be addressed to ensure a robust and inclusive evaluation.

1.1.682 Personal Observations

In addition to the planning matters above, I am personally concerned because: There are so many other places to site wind farms. This area is outstanding cultural and socioeconomic value.

Based on my own local knowledge, I also wish to highlight that: The religious significance of Iona is of international importance snd has not been properly considered in this planning.

Finally, I would also ask the Scottish Ministers to consider: Go back to energy companies and tell them to utilise the existing wind farms more effectively (ie do not turn them off). And then consider more carefully the alternative locations available for offshore wind farms. If that makes the developments more expensive for the energy companies then drop their exec bonuses.

1.1.683 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the governing statutory and policy framework. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage of the area. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities affected were identified, they were never properly assessed. Furthermore, the ecological requirements have not been satisfactorily evidenced as capable of being met. It is also pertinent to note that the application submitted represents only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence. Should the Ministers consider granting approval, it is requested that the applicant be required to provide further environmental information and enhanced visualisations. Additionally, the determination of these applications should be deferred pending a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the outcome, it is further requested that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their formal reasons for decision.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 170
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), pertain to the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning some 448 square kilometres of marine environment north-west of Islay and west of Colonsay. This location lies around 21 kilometres from Iona and is proximate to the islands and coastal communities of the southern Hebrides.

I request that this letter be recognised as a formal objection, that I be duly registered as an objector, and that I receive notification of the decision regarding these applications.

The objections detailed herein are grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing such proposals. It is imperative to note that the onus of proof lies squarely with the applicant. The applicant must provide sufficient evidence to satisfy all applicable tests and requirements. Objectors bear no responsibility to substantiate the contrary. Upon careful evaluation of the information submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications ought to be refused consent for the reasons elaborated in the subsequent sections.

1.1.684 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence submitted does not adequately address these requirements, nor does it show that reasonable steps have been taken to mitigate adverse effects on these protected interests. This omission represents a significant shortfall in meeting the statutory obligations imposed on both the applicant and the Scottish Ministers in the determination of this proposal.

Given these deficiencies and the failure to demonstrate compliance with the statutory framework, the application conflicts with the legal and policy requirements established by Schedule 9 of the Electricity Act 1989. Where such conflicts and omissions exist, they must weigh decisively against the granting of consent. The absence of sufficient evidence to satisfy these duties undermines the legitimacy of the application and compels a refusal on the basis of non-compliance with the statutory duties designed to safeguard important environmental and heritage interests.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The submitted application does not provide adequate evidence to confirm compliance with these policies. There are identifiable deficiencies and omissions in the assessment of impacts on the historic environment and natural heritage, as required under GEN 6 and GEN 9. The application also lacks sufficient engagement records as mandated by GEN 18, and fails to present sound evidence in accordance with GEN 19. Furthermore, cumulative impacts have not been properly addressed in line with GEN 21. These shortcomings constitute conflicts with the applicable legal and policy framework.

Given that compliance with the National Marine Plan policies forms a statutory part of the assessment, and the application has not demonstrated such compliance, these failures weigh decisively against the granting of consent. The marine licence application should therefore be refused.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent.

In this case, the application does not provide sufficient evidence to confirm adherence to Policy 3 on biodiversity, nor does it adequately address Policy 4 concerning the protection of natural places. Similarly, the proposal fails to meet the requirements of Policy 7 regarding the safeguarding of historic assets and places. Furthermore, the submission lacks the necessary demonstration of compliance with Policy 11 on energy, leaving critical uncertainties unresolved.

Given these clear deficiencies and the absence of demonstrated compliance with the relevant NPF4 policies, the proposal conflicts with the applicable legal and policy framework. Consequently, these shortcomings constitute substantive grounds to refuse planning permission.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The evidence provided does not demonstrate

that a comprehensive environmental impact assessment has been undertaken in accordance with these statutory obligations. This omission represents a fundamental procedural defect, as the necessary identification and evaluation of significant environmental effects is a prerequisite for lawful decision-making under the regulations.

Furthermore, the applicant has not fulfilled the obligations imposed by the Habitats Regulations, which require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The absence of a proper habitats regulations assessment means that compliance with these legal requirements has not been demonstrated. Given these deficiencies and omissions, the proposal conflicts with the applicable legal and policy framework. As established by the evidence, such failures weigh decisively against the granting of consent for the development.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act and reiterated in the evidence provided (S01).

The proposal does not provide adequate evidence that the interests of the relevant island communities have been properly identified, assessed, or integrated into the planning decision. There are notable deficiencies and omissions in the applicant's consideration of these interests, resulting in a failure to meet the legal and policy framework established by the Islands (Scotland) Act 2018. This failure is material and significant, as the Act explicitly requires that where compliance is not demonstrated, or where evidence reveals shortcomings, these matters must weigh against the granting of consent (S01).

In light of the absence of satisfactory evidence that the proposal has properly considered and given due weight to the interests of island communities, the application is fundamentally flawed. The decision-making process must reflect the statutory duty imposed by the Islands (Scotland) Act 2018, and the failure to do so constitutes a clear basis for refusal. Accordingly, the proposal should be refused consent on the grounds that it conflicts with the statutory requirements to consider and protect the interests of island communities.

The applicant has failed to provide the robust, objective, and proportionate evidence necessary to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure is critical because the responsibility to prove such compliance rests squarely with the applicant.

The evidence clearly establishes that where compliance is not demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these shortcomings must weigh against the granting of consent. In this case, the applicant has not met this evidential burden. There is an absence of comprehensive proof that all legal and policy obligations have been satisfied, and no adequate justification has been presented to address these gaps.

Accordingly, the application does not fulfill the fundamental requirement to demonstrate adherence to the full spectrum of statutory and policy frameworks governing the proposal. This failure alone constitutes a substantive reason to refuse consent, as the applicant has not discharged the essential duty to provide conclusive evidence of compliance.

1.1.685 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is conditional upon compliance with its specified impact criteria, notably those set out in Policies 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal under consideration fails to meet these critical requirements. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining the intrinsic values these areas possess. Furthermore, the proposal does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their surrounding settings would be preserved. Equally, there is insufficient evidence to confirm that the interests and wellbeing of island communities would be adequately safeguarded. Lastly, the ecological assessments submitted do not establish that the necessary environmental tests can be satisfied. Taken together, these shortcomings signify that the proposal is in clear conflict with the impact criteria set out in NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy development.

The proposal must be assessed in light of the comprehensive framework established by the National Planning Framework 4 (NPF4), particularly the suite of policies designed to safeguard nationally significant landscapes, heritage assets, and biodiversity. As outlined in Policy 11, alongside Policies 4(c) and 4(d), there is a clear statutory requirement to protect National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities that underpin their designation. Additionally, Policy 7, including subsection 7(h), places emphasis on the protection of scheduled monuments and their settings, while Policies 7(c) and 7(d) further reinforce the importance of conserving historic assets within their contextual environments. Policy 3 addresses the essential need to preserve biodiversity, underscoring the interconnectedness of natural and cultural heritage protection within the planning regime.

Upon detailed examination, the proposal falls short of meeting these critical policy requirements. It has been demonstrated that the development would result in significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting directly with the protections intended under Policies 4(c) and 4(d). Moreover, there is a conspicuous absence of evidence to show that the cultural significance of scheduled monuments and their settings would be adequately protected in accordance with Policy 7(h). This lack of demonstration extends to the safeguarding of island communities, a point of particular sensitivity given their unique environmental and cultural contexts. The proposal, therefore, does not convincingly address the holistic protection envisaged by the relevant NPF4 policies.

Furthermore, the ecological assessments submitted fail to satisfy the necessary tests prescribed under Policy 3. The evidence does not establish that the potential impacts on biodiversity can be sufficiently mitigated or that the ecological integrity of the area

would be maintained. Taken together, these shortcomings indicate that the proposal is fundamentally at odds with multiple interrelated policies within NPF4 aimed at protecting nationally important landscapes, heritage assets, and biodiversity. In light of these considerations, it is clear that the proposal does not comply with the statutory framework designed to ensure sustainable development that respects and preserves the nation's valued environmental and cultural resources.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the relevant terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2. These detrimental impacts directly conflict with the objectives and protections established within the development plan framework. Furthermore, this inconsistency extends to National Planning Framework 4 when considered in its entirety. The applicant has not provided evidence to overcome these conflicts or to demonstrate compliance with the applicable policy requirements. Consequently, the proposal is fundamentally at odds with the terrestrial development plan framework pertinent to land-based effects and should be refused on this basis.

1.1.686 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Although the methodology outlined in Appendix 16.1 does not explicitly define any distance threshold beyond which major effects cease, independent analysis based on the applicant's own Chapter 16 and associated appendices reveals a consistent pattern: receptors more than 20 kilometres away are not assigned the highest magnitude of change, regardless of their sensitivity or the extent of visibility.

This implicit distance-based moderation is further confirmed by the applicant's own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where designated landscapes are located. This calls into question the reliability of the conclusions presented to the Scottish Ministers, as the methodology does not accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

When comparing mitigation measures, it is important to recognise the inherent limitations of the visualisation materials provided in support of the assessment. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot fully convey the true scale perceived by a

viewer on site. This acknowledgement highlights that even well-produced visual materials may underrepresent or distort the real visual impact experienced in the field.

Furthermore, the wireline drawings included alongside photographic panoramas share similar constraints. These drawings serve as technical renderings embedded within the visualisations rather than independent tools that correct or enhance the photographic evidence. As such, they do not overcome the fundamental perceptual challenges associated with representing three-dimensional scale and distance on a two-dimensional medium.

While these visual materials provide a useful indication of potential impacts, their acknowledged technical and perceptual limitations must be taken into account when assessing the effectiveness of proposed mitigation. Relying solely on these visualisations risks underestimating the true extent of the visual effects, suggesting a need for cautious interpretation within the decision-making process.

The introduction of aviation and navigation lighting across a currently unlit sea horizon would permanently alter the character of the night-time seascape for the 35-year operational life of the development. This change is not merely temporary; consenting to the proposal effectively signifies that the seascape is considered appropriate for wind farm use, establishing a policy precedent beyond the lifespan of the project. Such a shift in seascape character must be carefully weighed against the visual and environmental values identified in relevant policies, recognising that the harm extends throughout the operational period and influences future decisions regarding this coastal area.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore, there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.687 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment of the effects on the setting of historic assets does not comply with the required methodology, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland’s recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment fails to demonstrate this evaluative step. It is clear from the applicant’s approach that visual change is described in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation; however, the methodology explicitly states that visual change should not be equated directly with adverse impact, a distinction that the assessment does not adequately address.

A Methodological Audit, relying solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not show how the integrity of setting has been evaluated against the applicant's own accepted methodology. The audit highlights that the conclusion—asserting that the integrity of setting is adequately retained—is not supported by a demonstrable evaluative process. This omission calls into question the robustness and validity of the assessment's findings on heritage impacts, thereby weakening the evidential foundation upon which the applicant's conclusions are based.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, notably pilgrimage, arrival by sea, and movement through a living cultural landscape. It highlights the importance of the relationships between monuments, spirituality, and their surrounding landscape and seascape, emphasising that these are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—have requested additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the wider cultural context and experiential dimensions that contribute to the heritage assets' significance. Therefore, further consideration is necessary to properly address these aspects in the heritage impact appraisal.

The heritage impact conclusions presented rely substantially on the underlying landscape assessment. As identified in the applicant's evidence, where the landscape effects have been understated, these deficiencies inherently carry through to the heritage conclusions derived from them. Consequently, the credibility of the heritage impact assessment is undermined by the initial understatement within the landscape evaluation. This interdependence indicates that any shortcomings in the landscape assessment directly affect the robustness of the heritage conclusions, warranting a cautious approach to their acceptance.

There remains significant uncertainty as to whether the application complies with essential policies safeguarding heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Furthermore, the Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. In the absence of this critical evidence, the proposal does not meet key policy requirements for heritage protection and, therefore, cannot be considered acceptable.

1.1.688 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence is fundamentally motivated by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute

the primary attractions drawing visitors to the area, forming the cornerstone of the local economy.

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

In comparison to the rigorous mitigation requirements set out for environmental and socio-economic impacts elsewhere in the proposal, the assessment of effects on island communities is notably deficient. The proposal fails to meet the statutory and policy obligations established to protect these communities. Specifically, the National Marine Plan's GEN 19 and paragraph 4.81 mandate that decisions affecting marine environments must be founded on robust socio-economic evidence and adopt a precautionary approach where data is insufficient. Moreover, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and afforded due weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process.

Despite recognising the particular scrutiny island communities require, the applicant did not undertake the necessary assessment to understand how the proposal would affect them. No evidence has been provided to demonstrate compatibility with the principles of sustainable island communities, nor that the statutory duties owed to these populations have been fulfilled. As such, the proposal falls short of the established planning and statutory standards, undermining the protection and

consideration that island communities are entitled to under current policy and legislation.

1.1.689 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that there is an acknowledged risk of adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared for situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals that the applicant recognises potential environmental impacts that require mitigation or compensation under the derogation provisions.

The nature of these submissions indicates that the applicant is seeking to address possible harmful effects through measures aimed at compensating the guillemot population. However, it is important to note that the submission of such documentation does not represent a conclusive finding that no harm will occur; rather, it reflects a precautionary approach whereby the applicant acknowledges that the Scottish Ministers may reach a different conclusion regarding the presence or extent of adverse effects. This underscores the significance of the derogation case as a contingency within the planning process.

Consequently, the presence of these documents within the application should be regarded as a material consideration. They demonstrate the applicant's recognition of environmental sensitivities and a willingness to engage with the statutory procedures required to address potential impacts on a protected site. This approach aligns with the procedural requirements under relevant policy, but also highlights the need for careful scrutiny by decision-makers to ensure that any derogation and compensation measures are sufficient to protect the integrity of the North Colonsay and Western Cliffs Special Protection Area.

Developers must recognise that consent for projects potentially impacting protected habitats cannot be granted unless it is conclusively demonstrated that there will be no adverse effect on the integrity of the designated site. The legal framework, as established under the Habitats Regulations, imposes a high evidential threshold: consent is lawful only if no reasonable scientific doubt remains regarding the absence of harm. This places the onus squarely on the applicant to provide robust

evidence. Importantly, proposals relying solely on mitigation, compensation measures, or future monitoring fail to satisfy these statutory requirements.

This strict approach is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). Together, these establish a comprehensive policy context that echoes the imperative of protecting sensitive habitats and species. Accordingly, any application must not only meet the legal criteria but also align with these policy standards to secure consent, underscoring the necessity for rigorous scientific evidence from the outset.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.690 Cumulative and In-Combination Effects

The assessment of the current project is fundamentally flawed because it considers only a portion of the development before the Scottish Ministers, with significant components such as the export cable corridor and the onshore transmission works deferred to future applications. These elements are essential for the wind farm’s operation, yet their effects are excluded from the present evaluation. Consequently, the project’s impacts are never assessed in their entirety, but rather fragmented across separate consenting processes that follow the principal decision. This piecemeal approach contravenes established legal principles, as affirmed by the courts in Raeshaw Farms, which require that a project must be assessed comprehensively rather than being artificially divided into smaller parts whose individual effects might appear less significant. Therefore, the current assessment does not satisfy the necessary procedural and legal standards for a holistic evaluation of the project’s impacts.

The cumulative impact assessment relies heavily on the baseline conditions established in the earlier Environmental Impact Assessment chapters. It is important to recognise that if the foundational assessments concerning landscape, heritage, and socio-economic factors have understated the severity of effects, then the

cumulative assessment inevitably inherits these limitations. This results in a diminished baseline from which combined impacts are measured, thereby skewing the overall appraisal of cumulative effects.

Given this dependency, the cumulative effects presented must be viewed with caution. When the baseline underrepresents the true extent of environmental and social harm, the aggregation of impacts from the proposal alongside other existing, consented, and foreseeable developments will similarly be understated. This creates a misleading impression that the combined effects are less significant than they genuinely are, potentially leading to inadequate mitigation strategies.

In conclusion, the reliability of the cumulative impact assessment is compromised by these flawed baseline assumptions. Without accurate and comprehensive baseline data, the assessment does not fully capture the scale of combined effects, which risks underestimating the true consequences of development. It is therefore essential that these foundational assessments are revisited to ensure that cumulative impacts are properly understood and addressed.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Unlike a comprehensive assessment that would encompass all related works, including deferred elements, the current approach does not reliably identify or evaluate the cumulative and in-combination effects of the proposal in its entirety. This omission undermines the ability to compare and consider appropriate mitigation measures effectively across the full scope of the project.

Given this deficiency, it is essential that the decision-making process explicitly addresses the treatment of the deferred works to ensure compliance with policy and regulatory frameworks. Without such consideration, the potential environmental impacts may be underestimated, leading to insufficient mitigation and an incomplete understanding of the proposal's overall effects. Accordingly, the application as submitted does not satisfy the necessary standards for environmental assessment and planning policy adherence.

1.1.691 Public Engagement, Site Selection and Environmental Information

There is a significant uncertainty regarding the adequacy of public participation in the consultation process associated with the site-selection and application stages. The applicant places considerable weight on the site-selection process, making the quality of public involvement in that process directly material to the legitimacy of the decisions sought. However, deficiencies in participation identified at the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months of the year for island communities, a time when residents are fully engaged in continuous work throughout the visitor season and access to specialist advice is particularly limited. This contrasts starkly with the applicant's position, having had years and substantial professional and financial resources to prepare its case.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by decisions of such magnitude are afforded a realistic opportunity to engage meaningfully. The conditions under which the affected communities have been compelled to respond fall short of this standard. Given these circumstances, it is essential that Ministers bear this firmly in mind when considering the representations made, as the shortcomings in consultation undermine the credibility and fairness of the site-selection process.

When comparing the mitigation measures proposed within the application, it becomes apparent that reliance on future assessments, post-consent plans, monitoring, and additional approvals is insufficient to meet the requirements of the Environmental Impact Assessment (EIA) Regulations. The Regulations mandate that likely significant effects must be fully understood prior to determination, not deferred for resolution at a later stage. This approach undermines the fundamental purpose of the EIA as the principal evidential basis for the Scottish Ministers' decision-making process, as it leaves critical uncertainties unresolved at the point of consent.

Furthermore, a detailed examination of the environmental information reveals significant shortcomings that compromise its adequacy. The landscape assessment, for instance, reaches conclusions based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate proper application of its integrity test. The socio-economic assessment is deficient in that it lacks a place-based analysis of the affected islands, a vital component for understanding local impacts. Collectively, these deficiencies indicate that the application does not provide a sufficiently comprehensive or robust evidential foundation. Consequently, the Scottish Ministers cannot be satisfied that the environmental information before them is adequate to enable an informed decision in accordance with statutory requirements.

1.1.692 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This acknowledgement implicitly concedes that harm to the internationally protected

seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and significance of visual and community impacts on Iona, leading to an incomplete understanding of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The turbines would be visible from approximately 21 kilometres away, spanning around 39 degrees of the horizon, thereby affecting the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. Despite this recognition, the assessment omits a comprehensive evaluation of habitability impacts on the local community, a pathway identified by the applicant's own consultants, even though a household consultation revealed that 92 per cent of respondents on Iona object to the proposal.

Moreover, the proposal's impact on Iona's internationally important monastic landscape is inadequately addressed. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape as critical to the heritage value of sites such as the Abbey, the Nunnery, and the high crosses. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. To contextualise the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres—by around 194 metres, despite being viewed from roughly two-thirds of that distance. This comparison further emphasises that the applicant's assessment fails to fully capture the extent and significance of the visual and heritage effects on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation.

The applicant's assessment appears to underestimate or omit significant effects on several important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. While some mitigation measures are proposed, a detailed comparison reveals shortcomings in addressing the specific sensitivities and contexts of these areas. Ulva, for example, lies within the Loch na Keal National Scenic Area and is a community-owned island at the beginning of its regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting, yet no assessment has been made of the effects on Ulva, despite it sharing in full the impacts on the wider National Scenic Area. This omission is particularly concerning given the community's dependence on the qualities at stake. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of the most celebrated small islands in Europe, lies

approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite recognising the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's international importance. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only medium to low magnitude effects, with this moderation explained by distance, apparent scale, and retained landforms. However, this assessment seems to overlook the fundamental basis of Jura's designation, which rests on the wild, undeveloped character of its Atlantic outlook—precisely the quality potentially compromised by the development. A similar approach is taken to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, which also receives a comparable assessment. Taken together, these assessments suggest a pattern of underestimation or insufficient consideration of significant effects on designated landscapes and island communities, particularly where their defining qualities are dependent on unspoilt seascapes and remoteness. In conclusion, the applicant's approach does not fully acknowledge or mitigate the likely impacts on these sensitive areas, thereby risking harm to their natural and cultural attributes that warrant stronger protection.

The applicant's Environmental Statement assesses the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes a Low magnitude of change to the proposed development's visual impact. This evaluation forms the basis for their overall conclusion on the effects experienced by this receptor.

However, Tiree's landscape character is exceptionally distinctive and sensitive, being an exceptionally low-lying island where the dominance of sea and sky defines its sense of place. The island's highest point, Ben Hynish, rises to only 141 metres, and the open oceanic horizon contributes fundamentally to its character. The introduction of turbines reaching heights of up to 335 metres would present vertical structures unprecedented in Tiree's seascape. Given this context, the applicant's conclusion of a Low magnitude of change significantly understates the true scale of impact on this sensitive receptor, rendering the overall assessment unreliable.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

The practical consequence of the applicant's distance-based approach to environmental impact assessment is a systematic underestimation and discounting of significant effects on sensitive receptors located beyond approximately 20 kilometres. This methodology results in a moderated magnitude of change assigned to these receptors, despite their acknowledged sensitivity. Critically, the communities residing in these areas have not been afforded any place-specific assessment of the impacts they are likely to experience. Taken together, these factors demonstrate a consistent pattern within the applicant's assessment whereby effects on distant yet highly sensitive receptors are diminished in importance solely due to their distance from the site. Such an approach undermines the integrity and comprehensiveness of the environmental impact assessment by failing to fully recognise and evaluate the true extent of potential effects on these communities. Consequently, the assessment does not provide a robust or reliable basis for decision-making regarding the wider environmental and social consequences of the proposed development.

1.1.693 Personal Observations

In addition to the planning matters above, I am personally concerned because: Az a frequent visitor to these islands it would be a travesty if thus propsal went ahead. For all the reasons mentioned

Finally, I would also ask the Scottish Ministers to consider: Yes.. the will and the concerns of the public

1.1.694 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the local communities and cultural heritage of the coastal region. Furthermore, analysis of the applicant's submitted documentation reveals that these impacts have been underestimated, and a comprehensive heritage assessment, as mandated, has not been completed. While the implications for the island communities affected by the development were identified, they have not been subjected to proper assessment. Additionally, the ecological criteria necessary for approval remain unproven, and notably, only a portion of the overall project has been presented for consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that the Scottish Ministers should decline consent for the proposed offshore wind farm and refuse the corresponding marine licence. Should the Ministers decide against refusal, it is requested that they seek further environmental information and enhanced visual representations, and that the applications only be determined following a public inquiry. Such an inquiry would enable thorough examination of the concerns raised in this objection. Irrespective of the decision reached, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 171
Dear Sir/Madam,

I hereby formally register my objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request to be recorded as an objector and to receive notification of the final decision regarding these applications.

The project in question involves the development of an offshore wind farm with an estimated capacity of around 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. This development is planned within a designated Windfarm Development Area spanning approximately 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in the planning and environmental considerations relevant to these applications, assessed against the statutory and policy framework governing such developments. It is important to emphasise that the responsibility lies with the applicant to provide robust and sufficient evidence to meet the required planning tests. Objectors, including myself, are not obliged to disprove the applicant's case. In light of the evidence presented, the applicant has failed to satisfy the necessary criteria, and therefore, the applications should be refused consent.

1.1.695 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests.

The Scottish Ministers, in determining this application, are similarly bound to have regard to these statutory duties. However, the evidence before the determining authority does not adequately show that these requirements have been met. There are clear deficiencies and omissions in the applicant's consideration and mitigation of impacts on the protected interests identified by Schedule 9.

Where such compliance has not been demonstrated, and where the evidence reveals conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. On this basis, the application should be refused.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including

GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application's statutory assessment. Without such demonstration, the application cannot be considered to have met the legal threshold required for authorisation under the Marine (Scotland) Act 2010.

Furthermore, the evidence submitted reveals significant omissions and conflicts with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 undermines the credibility and reliability of the environmental and heritage assessments. The lack of adequate engagement as mandated by GEN 18 further compromises the procedural integrity of the application. Additionally, the application does not satisfactorily address cumulative impacts as required by GEN 21, nor does it ensure the protection of the historic environment, landscape, and natural heritage in accordance with the relevant policies. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent. In light of these unresolved deficiencies and the absence of compliance with the National Marine Plan policies, the marine licence application should be refused.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy resources.

However, the evidence before the determining authority does not demonstrate compliance with these policies. There are identified deficiencies and omissions in the applicant's submissions that fail to satisfy the requirements of Policy 3 regarding biodiversity protection. Similarly, the proposal does not adequately address the preservation of natural places as required by Policy 4. The impact on historic assets and places has not been sufficiently assessed or mitigated in accordance with Policy 7. Furthermore, the application lacks the necessary evidence to confirm conformity with Policy 11 on energy, including any assessment of energy efficiency or sustainable energy use.

These shortcomings represent clear conflicts with the applicable legal and policy framework established by NPF4. As stated in the applicant's own evidence, where compliance has not been demonstrated, or where deficiencies and omissions exist, these matters weigh against the granting of consent.

In conclusion, the proposal fails to comply with the relevant policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11. The absence of demonstrated compliance and the presence of significant evidential shortcomings justify refusal of planning permission.

The application must be refused because it fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment as set out in law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the applicant is required to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. This statutory obligation has not been fulfilled, as the evidence demonstrates that the environmental impact assessment is inadequate and incomplete.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not provide sufficient evidence to demonstrate compliance with these requirements. There are significant deficiencies and omissions in the habitats regulations assessment, leaving the potential impacts on protected sites unquantified and unmitigated.

Where compliance with these legal frameworks has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these failures must weigh decisively against the granting of consent. In this case, the absence of a robust and compliant environmental impact assessment and habitats regulations assessment constitutes a fundamental procedural and evidential defect that precludes lawful approval of the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, thereby rendering the decision-making process legally deficient. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight during planning determinations. This statutory obligation is not a discretionary consideration but a mandatory requirement that must be demonstrably fulfilled to ensure lawful decision-making.

In this case, the application documentation and supporting evidence do not provide any substantive analysis or assessment of the potential impacts on island communities, nor do they demonstrate how these interests have been integrated into the planning balance. The absence of such consideration constitutes a clear omission and a failure to comply with the statutory framework established by the Islands (Scotland) Act 2018. Without evidence of compliance, the decision-making process is incomplete and flawed.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions exist in addressing the interests of island communities, these shortcomings must weigh against the granting of planning consent. The failure to properly consider these interests undermines the legitimacy of the proposal and conflicts with the applicable legal and policy framework designed to protect island communities.

In conclusion, the proposal does not meet the statutory requirements of the Islands (Scotland) Act 2018 due to its failure to properly consider and give due weight to the interests of island communities. This fundamental deficiency weighs decisively against the granting of planning permission.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted evidence does not conclusively prove compliance with all applicable legal and policy frameworks. Furthermore, where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given these shortcomings, the application does not fulfill the necessary requirements to justify approval.

1.1.696 Conflict with National Planning Framework 4 and the Development Plan

The proposal's compliance with NPF4 Policy 11 must be assessed in light of the policy's impact criteria, which clearly condition support for renewable energy developments upon demonstrable mitigation of adverse effects. While NPF4 Policy 11 endorses renewable energy, this endorsement is contingent upon satisfying specific impact tests, including those relating to communities (Policy 11(c)) and landscape, seascape, and other receptors (Policies 11(d) and 11(e)). In this instance, the evidence fails to demonstrate adequate mitigation measures that would address these tests. The adverse effects on nationally designated landscapes and seascapes are significant and remain insufficiently mitigated. Furthermore, the proposal does not convincingly show that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that island communities would be protected as required.

Beyond the landscape and cultural heritage concerns, the ecological considerations underpinning NPF4 Policy 11 have not been satisfactorily addressed in the submitted evidence. The policy's ecological tests require clear demonstration that potential impacts can be managed or avoided, a standard the proposal does not meet. Taken together, these shortcomings result in a fundamental conflict with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Consequently, the proposal cannot be considered compliant with the policy framework, and its approval would be inconsistent with the statutory planning objectives that seek to balance energy development with environmental and community safeguards.

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

The applicant's evidence confirms that, in relation to land-based effects, the proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it is acknowledged that the development would adversely affect landscape character, heritage assets, and community interests that these policies are designed to protect. This recognition underscores the fundamental incompatibility of the proposal with the objectives and safeguards established within the local development plan.

Furthermore, this conflict extends to the broader planning policy context, as the proposal is also inconsistent with National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient demonstration to overcome these identified policy conflicts. Consequently, the proposal cannot be regarded as compliant with the relevant development plan framework, thereby undermining its acceptability within the established terrestrial planning policy regime.

1.1.697 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is a systematic understatement of the potential effects on the most sensitive designated landscapes, which are often located beyond 20 kilometres from the development area. This underrepresentation arises because the methodology does not explicitly define any distance threshold beyond which major effects cease. Nevertheless, an independent Evidence Note, drawing solely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of its sensitivity or the extent of its visibility to the development.

Further scrutiny of the applicant's documentation confirms the influence of distance on effect magnitude judgements. For instance, a coastal area more than 30 kilometres from the site is assessed as experiencing only a small scale of change due to the viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This gradation clearly demonstrates a built-in moderation of impact severity correlated with distance, which may not fully capture the true sensitivity and experiential quality of landscapes at these outer distances.

Consequently, the protective tests designed to safeguard landscape and visual amenity are being applied to inputs that systematically diminish the perceived

magnitude of effects at the critical distances where the most sensitive designated landscapes are situated. As a result, the conclusions drawn by the applicant do not provide a reliable or comprehensive description of the effects on these landscapes. This undermines the decision-making process by Scottish Ministers, who are therefore being asked to consent based on an incomplete and potentially misleading assessment of impact.

The assessment finds that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape for the entirety of the stated 35-year operational period. This change would have a lasting visual impact on the natural coastal environment, fundamentally transforming the experience of the seascape after dark.

It is important to note that the 35-year operational lifespan should not be regarded as a limitation on the significance of this harm in policy terms. Granting consent to the development effectively signifies that this particular seascape is deemed suitable for wind farm use, thereby accepting the associated lighting effects and their consequences as an inherent part of that designation.

In conclusion, the introduction of lighting would represent a substantive and enduring change to the night-time seascape, with implications that extend beyond the temporal framework of the development's operational life. This consideration weighs heavily against the proposal when evaluated against policies protecting seascape character, and as such, the development is not supported on the grounds of its adverse impact on the night-time seascape environment.

1.1.698 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and whether the integrity of setting is retained, the assessment does not demonstrate that it has undertaken this evaluative step. Instead, the assessment predominantly describes visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting is adequately retained. This approach conflates visual change with adverse impact, contrary to the methodology's explicit guidance. A Methodological Audit prepared in support of community objections, analysing the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the critical evaluation of setting integrity required by the methodology is absent from all examined examples.

While the applicant has sought to mitigate heritage impacts through various measures, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that underpin the significance of the affected assets. The applicant's own baseline acknowledges that the heritage significance is not confined to discrete monuments or static views but is deeply rooted in dynamic qualities such as pilgrimage, arrival by sea, and movement

through a living cultural landscape. This understanding underscores the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced through movement rather than from fixed viewpoints.

In this context, the applicant's assessment may not fully capture the extent of these wider cultural qualities. Historic Environment Scotland, in their consultation responses documented within the application, requested additional viewpoints to ensure that these experiential and landscape relationships are properly represented. This suggests that the initial assessment might have been limited in scope, potentially overlooking key aspects of cultural significance that contribute to the heritage assets' value.

Therefore, while mitigation efforts are acknowledged, there remains a concern that without a comprehensive representation of these broader cultural and experiential elements, the heritage impact assessment risks underestimating the true significance of the site. It would be prudent for the assessment to incorporate these wider perspectives to inform more effective and sensitive heritage protection measures.

The mitigation measures proposed rely heavily on the landscape assessment, yet this assessment notably understates the extent of landscape effects. As a result, the heritage impact conclusions, which are contingent upon the landscape findings, inherit this understatement. This fundamental flaw undermines the credibility of the heritage conclusions, calling into question the adequacy of the overall mitigation strategy.

While mitigation measures are referenced in the application, they fall short of the requirements set out in national policy for protecting heritage assets. Specifically, the proposal fails to comply with NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) related to the setting of heritage sites, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be safeguarded. Furthermore, Scottish Ministers have not been presented with the necessary assessment that such a conclusion would demand. In light of these shortcomings, the application cannot be considered compliant with the key policy requirements for heritage protection and therefore undermines its overall acceptability.

1.1.699 Effects on Island Communities, Tourism and the Local Economy

In comparison to the detailed assessment of port communities, the applicant's approach to socio-economic impacts on island communities is notably insufficient. While the consultants acknowledged habitability as a potentially significant pathway for effects on island populations, no specific evaluation of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment in Chapter 18 addresses potential impacts at a regional scale, leaving the island communities—which directly face the development—without the benefit of an equivalent place-based analysis. Despite this omission, the assessment concludes

that these island communities exhibit low sensitivity to tourism-related effects, a position that fails to reflect the unique circumstances of the islands.

The reliance on regional averages obscures the realities of small island economies, which differ fundamentally from broader regional profiles. These economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors, such as natural and cultural assets. Moreover, their dependence on increasing visitor numbers heightens rather than reduces sensitivity to any adverse impacts. To characterise these communities as having low sensitivity without a targeted, place-based analysis is not supported by evidence but rests on unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's conclusions and the adequacy of proposed mitigation measures for island communities.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, it conflicts with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which impose a duty to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages of the proposal to its conclusion. Although the applicant acknowledged the need for particular scrutiny of island communities, no adequate assessment has been undertaken to understand the potential impacts on them. Consequently, it remains unproven that the proposal aligns with the principles of sustaining island communities, and the statutory responsibilities owed to these communities have not been fulfilled. Therefore, the proposal cannot be regarded as compliant with the necessary planning and statutory standards for the protection and support of island communities.

1.1.700 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation throughout that process is directly relevant. However, deficiencies in participation identified at both the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities, during which residents are continuously engaged in work throughout the visitor season and access to specialist advice is at its lowest. This stands in stark contrast to the applicant's advantage of having had years to prepare its case, supported by substantial professional and financial resources.

National Marine Plan policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of this magnitude be afforded a realistic opportunity to engage. The conditions under which the affected communities have been expected to respond fall short of this standard. It is therefore incumbent on the Scottish Ministers to bear these shortcomings firmly in mind when considering the representations made,

recognising that the consultation process as conducted undermines the legitimacy of the site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application's dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.701 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

The applicant's assessment recognises significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is rated as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—being identified as the community most directly affected by changes to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas are acknowledged. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity across distances ranging from approximately 21 to 33 kilometres, though the applicant attributes this only a Medium magnitude of effect.

However, the applicant's reliance on viewing distance as a primary determinant of impact magnitude results in a notably limited appraisal of certain areas. For example, the Wilderness and Gribun Rocks coastal area is judged to experience a small scale of change due to its viewing distance exceeding 30 kilometres, reflecting a distance-based reasoning that fails to capture the true extent of impact. Crucially, the assessment does not provide place-based evaluations for Mull's west-facing tourism

economy, wildlife boat operations, or the accommodation sectors of its western townships, all of which depend intrinsically on the Atlantic seascape that the proposed development would industrialise. This omission neglects the significant visual, economic, and community effects on these tourism-dependent communities and their surrounding designated landscapes, undermining the comprehensiveness of the applicant's impact assessment.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Area, yet its conclusions understate the significance of these impacts. Ulva, a community-owned island at the outset of regeneration, shares fully in the effects on the National Scenic Area; its small, re-establishing community depends fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment has been undertaken for Ulva's unique circumstances. Staffa, situated approximately 35 kilometres from the development, lies beyond the 30-kilometre threshold recommended by NatureScot for assessing National Scenic Area qualities; notwithstanding the applicant's acceptance of the island's panoramic maritime qualities, it concludes that effects there would be small and not significant. Similarly, the Jura National Scenic Area, assessed at a distance of about 28 to 32 kilometres and of high sensitivity, is attributed only medium to low magnitude effects due to perceived mitigation by distance and retained landforms, despite its designation being founded on the wild and undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, is treated in the same manner. This approach collectively underestimates or omits significant effects on these important designated landscapes and fails to recognise the vulnerability of island communities such as Ulva, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true extent of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its entire landscape defined by the dominance of sea and sky. Its highest point, Ben Hynish, reaches only 141 metres, and the island's character relies heavily on an open oceanic horizon. Introducing turbines up to 335 metres in height would present vertical structures unprecedented in the seascape. Given this exposure and sensitivity, the conclusion of a Low magnitude of change fails to capture the substantial visual and character effects, leading to an unreliable overall assessment of impact on this receptor.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the proposed development area, resulting in an incomplete evaluation of potential impacts. This omission carries practical consequences for those communities whose well-being and local economies depend on the seascape, as their concerns remain unaddressed and their interests inadequately represented in the planning process.

Notably, the community-owned island of Gigha, a nationally recognised symbol of island regeneration following its purchase by residents, faces the development site

from the east. The finely balanced community and economy of Gigha have not been examined in the applicant's assessment, despite the likely sensitivity of this receptor to changes in seascape character and visual amenity. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the kind of receptors affected by the distance-based visual impact moderation that this objection highlights, yet they have not been properly accounted for.

Further, the chain of communities along the west coast of Kintyre, whose character and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters, share a comparable vulnerability. The Treshnish Isles and other small islands and mainland coasts with views towards the development area are similarly positioned. The exclusion of these receptors from the assessment undermines the comprehensiveness of the applicant's evaluation and risks overlooking adverse effects on the social and economic fabric of these interconnected communities. For these reasons, the assessment must be revisited to include a thorough appraisal of impacts on all relevant mainland and island receptors.

1.1.702 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Iona is a 'special' religious place and to surround it with wind turbines is unthinkable.

1.1.703 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Furthermore, independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been undertaken. Additionally, while the effects on the island communities involved were identified, no formal assessment of these impacts has been completed. The ecological criteria applicable to the project have also not been shown to be achievable. It should be noted that Scottish Ministers are currently considering only part of the project.

In light of these deficiencies, I respectfully urge Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the related marine licence application. Should the Ministers decide against refusal, I request that they require the submission of further environmental information alongside enhanced visual representations of the project. Moreover, I contend that the applications should not be determined without the benefit of a public inquiry, during which the concerns raised in this objection can be thoroughly examined. Regardless of the final decision, I also seek a clear and explicit statement from the Ministers addressing the impacts on cultural heritage and the affected island communities within their decision reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 172
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded, that I be registered as an objector, and that I receive notification of the outcome of these applications.

The project under consideration seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The development entails the installation of between 91 and 144 turbines, each reaching a maximum blade tip height of up to 335 metres. The proposed site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The grounds for objection are detailed below, structured in accordance with the pertinent statutory and policy framework that governs the determination of these applications. It is important to emphasise that the onus lies with the applicant to convincingly demonstrate, supported by robust evidence, that all relevant statutory and policy tests are satisfied. Objectors bear no obligation to prove contrary positions. Based on the deficiencies identified herein, it is evident that the applicant has failed to meet this evidential burden, and therefore, consent should be refused.

1.1.704 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not show that the applicant has adequately addressed these requirements or taken reasonable steps to mitigate adverse effects on these protected interests. This omission is significant given the statutory obligation imposed both on the applicant and the Scottish Ministers in the determination process.

Furthermore, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory duties, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent. The application’s shortcomings in meeting these fundamental statutory requirements undermine its legitimacy and warrant refusal in accordance with the statutory mandate.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of

Scotland's National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The application has not demonstrated compliance with these policies. There are deficiencies and omissions in the evidence submitted, and conflicts with the applicable legal and policy framework remain unaddressed. In particular, the lack of sound evidence as required by GEN 19 and paragraph 4.81 undermines the statutory assessment. Furthermore, the application fails to adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. The absence of sufficient engagement in accordance with GEN 18 further compounds these shortcomings. The failure to properly consider the historic environment, landscape, natural heritage, and co-existence policies indicates a fundamental non-compliance with the National Marine Plan.

Given these unresolved deficiencies and conflicts, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established, where compliance has not been demonstrated or where evidence identifies such shortcomings, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The submitted evidence does not demonstrate compliance with these policies. Furthermore, the evidence identifies deficiencies and omissions in addressing the applicable legal and policy framework. In accordance with the guidance that where compliance has not been demonstrated or conflicts exist, these matters weigh against granting consent, the proposal should be refused.

The proposal fails to comply with the fundamental legal requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory obligation is not met in the current submission, resulting in a deficient environmental impact assessment that precludes a lawful and informed decision-making process. Without a comprehensive and robust assessment, the determining authority cannot properly evaluate the environmental consequences of the proposal, thereby undermining the integrity of the planning process.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which explicitly require an assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a

demonstrably adequate habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly considered or mitigated. This omission is a critical failure, as it contravenes statutory duties designed to safeguard biodiversity and protected sites, and it prevents the authority from fulfilling its legal obligations under the Habitats Directive and related domestic legislation.

Given these clear deficiencies and omissions in both the environmental impact assessment and the habitats regulations assessment, the proposal is in direct conflict with the applicable legal and policy framework. Where compliance with these statutory requirements has not been demonstrated, the law and planning policy dictate that such failures must weigh decisively against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the essential environmental assessment and habitats protection standards required by law.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement explicitly obliges decision-makers to ensure that the interests of island communities are given due weight during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal standards set out in the Act.

Furthermore, the evidence before the determining authority reveals clear deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a direct conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with statutory duties is not demonstrated, and where material shortcomings are evident, these factors must weigh decisively against the granting of planning consent. Consequently, the proposal should be refused on the grounds that it does not meet the statutory requirements for the proper consideration of island communities.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental breach of the evidential burden incumbent upon the applicant. The submitted documentation contains deficiencies and omissions that remain unaddressed, resulting in unresolved conflicts with the applicable legal and policy framework. Given that compliance has not been satisfactorily demonstrated, these shortcomings must weigh decisively against the granting of consent. In conclusion, the application does not meet the necessary evidential standards to satisfy legal and policy obligations and therefore should be refused.

1.1.705 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy’s intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with

specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

When considering mitigation measures, it is essential to compare the proposal's approach with the requirements set out in relevant policies of the National Planning Framework 4 (NPF4). Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they were designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets—provides a framework to safeguard cultural heritage. Policy 3 further establishes rigorous biodiversity protections. In this context, the proposal falls short. It would result in significant adverse effects on nationally designated landscapes and seascapes, with no demonstrated mitigation adequate to protect these qualities. Similarly, the cultural significance of scheduled monuments and their settings has not been shown to be preserved. The proposal also fails to provide evidence that island communities would be safeguarded, nor that the ecological tests under Policy 3 can be satisfactorily met based on the submitted evidence. Accordingly, the proposal conflicts with these interrelated NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These detrimental effects undermine the purpose of the policies designed to protect the terrestrial environment and local character of the area. Consequently, the proposal fails to align with the objectives set out in the development plan framework relevant to land-based considerations.

This inconsistency extends beyond the local plan to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with or justifies departure from these strategic planning policies. As a result, the proposal stands in

clear conflict with the established planning policy framework at both local and national levels.

In light of these points, the proposal cannot be supported as it contradicts essential policy protections for the land-based environment within Argyll and Bute. The adverse effects identified and the lack of demonstrable compliance with the development plan justify refusal in accordance with established planning principles.

1.1.706 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of landscape and visual effects at distances where the most sensitive designated landscapes are located. Despite the absence of any explicit distance threshold in the applicant's Appendix 16.1 beyond which major effects cease, the evidence demonstrates a consistent pattern across all three streams of assessment: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern indicates an implicit distance-based moderation that is not transparently acknowledged in the methodology.

The applicant's own documentation further confirms the influence of distance in shaping judgements of effect magnitude. For example, an assessment of a coastal area over 30 kilometres away qualifies the scale of change as small, explicitly citing the viewing distance as a key factor. Similarly, the Landscape Character synthesis categorises magnitude as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. These distance thresholds, while not formally stated in the methodology, effectively constrain the recognition of significant effects at greater distances, where important landscape receptors are situated.

As a result, the protective tests applied in the assessment process are based on understated inputs. By moderating magnitude values at distances coinciding with the location of the most sensitive designated landscapes, the conclusions drawn cannot be regarded as a reliable or accurate reflection of the true effects the Scottish Ministers are being asked to consider. This calls into question the robustness of the applicant's methodology and the validity of its predicted outcomes, undermining confidence in the decision-making process.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings

subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the stated 35-year operational life. This change represents a significant departure from the existing dark and natural maritime environment, which has until now been free from such artificial illumination.

It is important to note that the 35-year operational period does not confine the extent of harm in policy terms. A decision to grant consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of the associated lighting effects. This sets a precedent for the future management and character of the area, with implications extending beyond the immediate timeframe.

Given these factors, the impact of lighting on the night-time seascape character warrants careful consideration within the planning balance. While recognising the operational requirements for safety and navigation, the permanent alteration of a previously unlit horizon raises concerns about the long-term preservation of the seascape's intrinsic qualities, which policy seeks to protect.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.707 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, leading to significant doubts about the reliability of its conclusions concerning the setting of historic assets. By not properly evaluating whether changes to setting affect the contribution setting makes to cultural significance, the assessment undermines confidence in its findings. This methodological shortfall is

critical because it impedes a proper understanding of whether the integrity of setting is adequately retained, a fundamental consideration in assessing heritage impacts.

Historic Environment Scotland's recognised methodology, which the applicant claims to have adopted, explicitly requires an evaluation that goes beyond the mere description of visual changes. While the methodology involves consideration of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it clearly states that visual change alone should not be equated directly with adverse impact. The assessment, however, focuses primarily on these visual factors without demonstrating the essential evaluative step of assessing setting integrity, as prescribed by the methodology.

A Methodological Audit, prepared in support of community objections and based entirely on the applicant's own Appendix 14.3, confirms these concerns. It highlights that although the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been assessed in line with the accepted methodology. The audit notes that this evaluative stage is missing in all the worked examples examined. Consequently, the assessment's conclusion that the integrity of setting is adequately retained lacks the necessary methodological foundation, calling into question the validity of its heritage impact conclusions.

The practical consequence of the applicant's current approach is that the full cultural significance of the affected heritage assets may not be adequately understood or protected. The baseline information provided acknowledges that this significance is deeply rooted in experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These attributes emphasise the dynamic relationships between monuments, spirituality, and their surrounding landscape and seascape, which are experienced in motion rather than from static viewpoints. If the assessment fails to capture these broader cultural and experiential dimensions, it risks underestimating the true impact of the proposed development on heritage values.

Further reinforcing this concern, Historic Environment Scotland's consultation responses—recorded within the application itself—have specifically requested additional viewpoints to ensure these wider qualities are properly represented in the assessment. This highlights a recognised need for a more comprehensive evaluation that accounts for the intangible and interconnected aspects of the heritage assets. Without addressing this, the applicant's assessment may not meet the necessary standards for understanding and mitigating harm to the cultural landscape, potentially leading to adverse effects that are insufficiently identified or managed. It is therefore essential that these broader experiential qualities form an integral part of any heritage impact appraisal.

When comparing mitigation measures, it is important to recognise that the robustness of heritage impact conclusions is closely tied to the accuracy of the underlying landscape assessment. The effectiveness of proposed mitigation depends fundamentally on a clear understanding of the landscape effects, which in turn inform the heritage evaluation. If landscape effects are not fully accounted for, mitigation strategies may be insufficient or misdirected, thereby compromising their intended outcomes.

The assessment evidence demonstrates that the heritage conclusions are derived from the landscape assessment. As such, any understatement of landscape effects directly affects the credibility of the heritage impact findings. Specifically, where landscape effects have been downplayed or inadequately considered, the heritage conclusions constructed upon these findings inevitably inherit the same degree of understatement. This linkage creates a chain of uncertainty that weakens confidence in the overall evaluation process.

Consequently, reliance on a landscape assessment that understates effects undermines the foundation upon which heritage impact conclusions rest. For a comprehensive and reliable appraisal, it is imperative that the landscape assessment accurately reflects the true extent of effects. Without this, the heritage conclusions cannot be regarded as fully credible, and the justification for mitigation measures remains questionable.

There remains significant uncertainty as to whether the application complies with essential policies safeguarding heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Furthermore, the Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. In the absence of this critical evidence, the proposal does not meet key policy requirements for heritage protection and, therefore, cannot be considered acceptable.

1.1.708 Effects on Island Communities, Tourism and the Local Economy

The proposed development’s potential impacts cannot be adequately mitigated without fundamentally altering the qualities that attract visitors to the island communities in question. While mitigation measures might address isolated effects, they fail to preserve the intrinsic landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the visitor appeal. The applicant’s own baseline assessments confirm these attributes as critical to the islands’ character and visitor experience, thereby limiting the effectiveness of any partial or compensatory mitigation.

These qualities form the foundation of the island communities’ economic and social sustainability. The exceptional dependence on visitors means that any change to these attributes directly undermines the local economy, which supports essential services, population retention, and long-term community viability. Consequently, the proposal represents a fundamental threat to the islands’ continued existence as vibrant, sustainable communities rather than an impact that mitigation can suitably address.

The applicant’s socio-economic assessment fails to provide an adequate basis for mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct

any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

The proposal fails to meet the necessary planning and statutory requirements for assessing and protecting island communities, resulting in a significant shortfall in compliance with established policies and duties. According to GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where evidence is incomplete. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are thoroughly assessed and given due weight through meaningful engagement from the earliest stages through to the conclusion of the process. Despite recognising the particular scrutiny required for island communities, the applicant has not conducted the necessary assessment to understand the proposal's effects on these populations. Consequently, there is no demonstrated compatibility with the sustainability of island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. In summary, the proposal does not comply with key policy and statutory frameworks aimed at safeguarding island communities, and as such, it falls short of the standards required for approval.

1.1.709 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the potential ecological impacts of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the site itself. These designated features are indicative of high environmental sensitivity and conservation value, suggesting that any disturbance could have significant consequences.

Furthermore, the surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks. The introduction of extensive construction, operation, and eventual decommissioning activities over several decades raises concerns about the cumulative effects on these protected species and their habitats.

Given the scale and duration of the proposal, it is imperative to carefully assess and mitigate potential adverse environmental effects. The ecological importance of the area necessitates a precautionary approach to ensure that the natural environment is safeguarded throughout the development lifecycle.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant's approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant's recognition of ecological sensitivities and the need for compensatory measures.

The practical consequence of the stringent legal framework under the Habitats Regulations is that consent for any development potentially affecting protected habitats or species can only be granted if there is absolute certainty that the integrity of the designated site will not be compromised. This high evidential standard means that consent must be refused unless no reasonable scientific doubt remains regarding adverse effects. Importantly, the onus is on the applicant to provide robust evidence to demonstrate compliance with these requirements. Reliance solely on mitigation measures, compensation proposals, or future monitoring cannot, in isolation, satisfy the statutory tests necessary for lawful consent.

This rigorous approach is firmly embedded within the wider policy context, engaging not only the Habitats Regulations but also GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these provisions reinforce the necessity for a precautionary and evidence-led approach when assessing development proposals affecting protected sites. Consequently, planning decisions must give full effect to these overlapping statutory and policy safeguards, ensuring that environmental protection remains paramount and that consent is only granted where all legal and policy criteria are unequivocally met.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed to approval. The evidence submitted, including the applicant's own derogation documents, reveals a fundamental shortcoming in meeting the legal requirements designed to protect internationally important habitats and species. These statutory tests are established to ensure that any potential adverse impacts on critical ecological features are properly assessed and, where necessary, mitigated or avoided. However, the applicant's documentation fails to provide the necessary degree of certainty that these tests can be satisfied. Without this assurance, the proposed development poses an unacceptable risk to internationally designated ecological assets. Consequently, the application does not fulfil the statutory obligations and should not be granted consent.

1.1.710 Cumulative and In-Combination Effects

The assessment of the current project is fundamentally flawed because it considers only a portion of the development before the Scottish Ministers, with significant components such as the export cable corridor and the onshore transmission works

deferred to future applications. These elements are essential for the wind farm's operation, yet their effects are excluded from the present evaluation. Consequently, the project's impacts are never assessed in their entirety, but rather fragmented across separate consenting processes that follow the principal decision. This piecemeal approach contravenes established legal principles, as affirmed by the courts in Raeshaw Farms, which require that a project must be assessed comprehensively rather than being artificially divided into smaller parts whose individual effects might appear less significant. Therefore, the current assessment does not satisfy the necessary procedural and legal standards for a holistic evaluation of the project's impacts.

The practical consequence of relying on the current cumulative impact assessment is that it fails to accurately reflect the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the cumulative assessment is fundamentally dependent on the baseline conditions established in the preceding Environmental Impact Assessment. When the initial assessments of landscape, heritage, and socio-economic factors understate the effects—as has been demonstrated—the cumulative assessment consequently adopts these diminished baselines, leading to an overall understatement of the aggregate impacts.

This issue is critical because an inaccurate baseline distorts the starting point from which cumulative effects are measured, thereby undermining the reliability of the entire assessment. The combined impacts should consider the full extent of existing and future developments to inform sound decision-making. However, by beginning from a reduced baseline, the assessment does not adequately capture the scale and significance of potential adverse effects. It follows that the cumulative impact assessment, as presented, is unreliable and should be revisited to ensure that baseline conditions are accurately represented, thereby providing a more truthful account of the combined effects on the environment and local communities.

There remains considerable uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, specifically concerning the issue of project splitting. The requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations, necessitate a comprehensive and reliable identification and assessment of cumulative and in-combination effects arising from the proposal. In this instance, the applicant has not sufficiently demonstrated that these effects, nor the impacts of the project in its entirety, have been adequately considered.

Furthermore, the treatment of deferred works has not been explicitly addressed within the application or its supporting documentation. It is essential that the decision-making process explicitly considers these elements to ensure full compliance with policy and regulatory frameworks. Without such clarification and assurance, it is not possible to conclude that the proposal meets the necessary standards for environmental assessment and planning approval. Therefore, I respectfully request that the decision-making authority requires an express and thorough evaluation of the deferred works as part of the determination.

1.1.711 Public Engagement, Site Selection and Environmental Information

While mitigation measures may address certain environmental concerns, the fundamental deficiencies in public participation and consultation timing critically undermine the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place significant weight on this process; however, the quality of public engagement throughout both the plan and site-selection stages has been inadequate and has persisted into the application phase. The application itself consists of thousands of pages of technical material, yet the consultation period was scheduled during the busiest months for island communities—when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant's extensive preparation time, supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation, as enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage in decisions of this scale. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are urged to consider this firmly when evaluating the representations submitted.

The Environmental Impact Assessment submitted in support of this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, its adequacy is fundamentally compromised across several key topics. For example, the landscape assessment purports to identify significant effects but relies on a distance-based outcome pattern that its own methodology does not support. Similarly, the heritage assessment fails to demonstrate the application of its stated integrity test, undermining confidence in its conclusions. The socio-economic assessment is also deficient, notably lacking any place-based analysis of the islands directly affected by the proposal.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring regimes, and additional approvals to address matters that should be resolved at this stage. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant environmental effects be fully understood prior to determination. The Scottish Ministers are bound to make their decision based on the evidence currently before them, not on the assumption that outstanding issues will be satisfactorily addressed later.

In light of these considerations, the applicant has not demonstrated that the environmental information provided is adequate for the purposes of determination. Therefore, the Environmental Impact Assessment as submitted fails to meet the necessary standards, and the application should not be approved on the basis of incomplete and insufficient environmental information.

1.1.712 Effects on Local Area

The applicant's assessment identifies Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly considers Islay through the perspective of its potential role as a direct project location, rather than as an affected island community in its own right. This approach overlooks the fact that Islay's

Atlantic-facing communities confront the nearest edge of a substantial 448 square kilometre development area. Despite this proximity, the assessment fails to provide any place-based evaluation of the development's effects on Islay's setting, economy, or community life. This omission undermines the reliability of the environmental and heritage impact evaluation as it neglects the lived experience and socio-economic dynamics of these communities directly adjacent to the project.

For Colonsay and Oronsay, the situation is similarly inadequately addressed. The seaward outlook, which fundamentally shapes daily life on these islands, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan. This indicates an explicit recognition within the application that harm to the internationally protected seabird population of these cliffs cannot be excluded. Additionally, Oronsay Priory, a scheduled monument of national importance, lies within this community's area. The deficiencies previously identified in the heritage assessment apply with equal force to the treatment of the Priory's open maritime setting. Collectively, these factors illustrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall robustness of the environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant across approximately 21 kilometres, where turbines would span around 39 degrees of the horizon. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes significant effects upon residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts, particularly regarding the island's internationally important monastic heritage. The baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing—has not been fully addressed. Notably, no visualisation has been provided from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point integral to appreciating the heritage context.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect without subsequently undertaking an assessment of this impact. The scale of the turbines is also understated; for instance, Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—would be surpassed in height by the largest turbines by about 194 metres, despite the turbines being located at roughly two-thirds of that distance.

In summary, while the applicant recognises certain significant effects on Iona, the overall evaluation falls short in fully capturing the extent and depth of visual, community, and heritage impacts. This underestimation compromises the accuracy and reliability of the environmental and social impact appraisal for the island.

The applicant's assessment inadequately addresses the significant impacts on the coastal communities and landscapes of Mull and Ross of Mull, which has practical consequences for both local residents and the tourism economy. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only Medium magnitude of effect. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross. Furthermore, Fionnphort—the gateway to Iona and primary embarkation point for visitors—is identified as experiencing significant effects. This community is directly dependent on the flow of visitors, and yet no tailored, place-based assessment has been provided to reflect its unique relationship with the development.

Similarly, across Mull, significant effects are accepted by the applicant on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout at distances between approximately 21 to 33 kilometres. Despite this, the magnitude of effect is limited to Medium, which underplays the true visual and experiential impact on this nationally designated landscape. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small due solely to viewing distances exceeding 30 kilometres. Such an approach fails to adequately consider the cumulative and perceptual significance of the development in these sensitive locations.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers in its western townships—relies heavily on the intactness of the Atlantic seascape, which the proposed development would industrialise. Despite this dependency, none of these communities has been afforded a thorough, place-based assessment to understand the full extent of economic and social consequences. In sum, the applicant's evaluation does not satisfactorily capture the scale or significance of the effects on the landscapes and communities most intimately tied to these coastal and seascape environments.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic, making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island's natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree's sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

While the applicant's assessment applies a distance-based moderation to mitigate the visual effects of the proposed development, this approach inadequately addresses the significant impacts on mainland and island communities with direct views and economic dependence on the seascape. The assessment notably omits any examination of Gigha, a community-owned island renowned nationally for its regeneration following purchase by its residents. Facing the development from the east, Gigha's finely balanced community and economy are vulnerable to unassessed effects, undermining the completeness of the applicant's evaluation.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation is applied, yet the assessment fails to fully consider their sensitivity. The west coast of Kintyre and its chain of communities,

whose character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura, and adjacent waters, likewise remain unassessed. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position, further evidencing a significant gap in the applicant's assessment and calling into question its comprehensiveness and reliability.

The applicant's approach to assessing environmental effects employs a systematic moderation and discounting of impacts on sensitive receptors located beyond approximately 20 kilometres, resulting in a significant underestimation of those effects. Taken together, the evidence demonstrates a clear pattern: wherever a highly sensitive receptor lies beyond this threshold, the magnitude of change is artificially reduced and the resultant effect is correspondingly diminished. Crucially, this approach fails to provide any place-based assessment for the communities experiencing these impacts, effectively overlooking their exposure and the significance of the effects upon them. Such a methodology undermines the integrity of the environmental impact assessment by neglecting the genuine extent and severity of impacts beyond the 20-kilometre boundary.

1.1.713 Personal Observations

In addition to the planning matters above, I am personally concerned because: My family visit the outer Hebrides and Hebrides 3 times a year.me and my husband have metal health issues. We visit because the area is so unspoiled and we can sit on a beach and forget the world an immerse ourselves in nature. If we look out to sea and see giant wind turbines it will have the opposite effect. We will be reminded of everything that unsettles us and a place that has become our solace and salvation will be lost.
Tourism in general will be massively impacted by the natural landscape being no longer natural and many local businesses rely on tourism for their income.
The fishing trade will also be effected.
The people of the outer Hebrides should be protected from the invasion of industry its such a special place.

Based on my own local knowledge, I also wish to highlight that: Erosion of the sea bed, pollution, underwater sound frequencies and vibrations effecting cetaceans, birds being list to the turbine blades. Potential contamination from the materials metal, rust, micro plastics , the wildlife is going to be disturbed by the construction and the turbines themselves

Finally, I would also ask the Scottish Ministers to consider: It is considered that the Environmental Impact Assessment (EIA) fails to fully assess likely significant effects on the marine environment, human health, coastal communities, and infrastructure. As explained in the following sections, key gaps in the assessment, combined with scientific uncertainty and unquantified cumulative impacts, mean that the application cannot yet be determined as compliant with Scottish planning and EIA requirements. Further detailed assessment and mitigation are therefore required before consent can be granted.
The sea as legal entity
The concept of granting legal personhood to the ocean or other natural resources

has been the subject of serious academic and policy studies and has already been implemented in various parts of the world. In Scotland, for example, the ocean has been afforded representation at the board level of the Scottish Association for Marine Science (SAMS) [1].
These developments illustrate a changing relationship between humans and the marine environment, highlighting that impacts by the Proposed Development considered acceptable today may not align with societal expectations or legal standards for future generations.
Vulnerability to terroristic, militaristic, and criminal attacks
The Proposed Development covers 208 km² and includes up to 350 km of subsea cables, located at least 5 km offshore [2]. Its remote location and large spatial extent make turbines, cables, and infrastructure potentially vulnerable to criminal, terrorist, or grey-zone activities [3].
The scoping report and related publicly available material do not mention any of these vulnerabilities. This despite Russian intelligence gathering ship Yuri Ivanovloitering in waters off the Outer Hebrides last year, following the completion of major NATO exercise Formidable Shield that took place nearby [4]. Later that year, the Russian intelligence vessel Yantar, capable of deploying mini submarines to cut cables or plant sabotage devices, was seen operating in the north of Scotland [5].
Additional concerns include potential rogue communication devices in offshore hardware and the use of foreign-manufactured turbine components, including Chinese suppliers such as Ming Yang, which MI5 has identified as a security risk [3]. Recently, the UK government blocked Ming Yang's plans to open the UK's largest wind turbine manufacturing plant in the Highlands [6]. The Applicant provides no information on the origin or security vetting of major hardware.
Given the increasing strategic importance of offshore wind and associated infrastructure, it would be helpful for the decision-maker to understand whether such risks have been assessed, and how the Proposed Development's resilience to external disruption has been taken into account.
Unexploded ordnance on the seabed
There are hundreds of thousands of items of unexploded ordnance (UXO) in the UK and European waters, creating serious risks to marine users during offshore wind development. Following initial site investigations, the Applicant does not anticipate that UXO clearance will be required for the Offshore Project and as such clearance of UXO is not included in this EIA or associated applications [7]. The Applicant considers UXO hazards only within the Array Site and Export Cable Corridor, but does not address the displacement of fishermen into higher-risk areas, as has occurred in the Firth of Forth [8].
The UXO risk assessment should extend beyond the Array Site and Export Cable Corridor to include areas where fishing and other marine activities may be displaced, to fully capture potential hazards to human safety.
Impact on phytoplankton growth and primary production
Phytoplankton play a critical role in oxygen production and oceanic carbon dioxide (CO2) uptake and form the base of the marine food web; while essential, excessive phytoplankton growth can lead to harmful algal blooms [3]. Offshore wind turbines may influence phytoplankton growth in multiple ways, and can both significantly enhance and reduce primary production, not only locally but also in the wider region [3,9,10].
While marine water quality is addressed at a high level, there is no evaluation of how construction and operation—particularly increased turbidity, sediment disturbance,

and changes to water column dynamics—may affect light availability, nutrient cycling, and hence phytoplankton growth [11].

Given the Applicant's claim to contribute to Scotland's 2045 net zero emissions target and up to 1.7 million tonnes of CO_2 savings [12], the absence of a baseline characterisation of phytoplankton concentrations and an impact assessment represents a gap in the EIA. A project of this scale should include explicit consideration of phytoplankton productivity and associated ecosystem implications.

Leading edge erosion of turbine blades

Leading-edge erosion, caused by the impact of raindrops and airborne particles on turbine blade coatings [3], becomes increasingly significant as blade lengths increase and tip speeds rise. With the proposed rotor diameter of up to 330 m [7], among the largest ever proposed, substantial leading-edge erosion can be expected [13].

This erosion has multiple consequences. Environmentally, it contributes to microplastic shedding, while operationally, it reduces aerodynamic efficiency, shortening the lifespan of a wind turbine blade. Conditions in the northeastern North Sea, with its higher wind and precipitation, accelerate coating degradation, resulting in blade lifetimes approximately 20% shorter than in the southwestern North Sea [13]. Seeing that the west coast of northern Scotland is more exposed to the rain-bearing westerly winds during winter storms than the east coast [14], leading edge erosion is expected to be worse in wind farms outside the Western Isles than anywhere in the North Sea.

Despite these factors, the publicly available planning documents do not include a specific assessment of leading-edge erosion, nor of the associated microplastic pollution, efficiency losses, or reduced turbine lifespan. This represents a gap in the assessment of both environmental and operational impacts.

Pollution by anti-corrosion systems on the metal

Corrosion-protection systems are employed to prevent turbine structures from rusting, both above and below water level, and sacrificial anodes or other cathodic protection systems can release highly toxic metals into the marine environment over time [3,15].

However, the EIA does not assess the potential environmental impacts of these materials, nor does it describe any mitigation strategy to minimize metal pollution such as proposed by Watson et al. [16]. The absence of this information represents a gap in the environmental assessment, and it is requested that the Applicant provides full details of corrosion-protection methods, anticipated emissions, and strategies to mitigate trace metal impacts before consent is granted.

Underwater infrasound

Infrasound—very low-frequency sound below 20 Hz—behaves fundamentally differently from higher-frequency acoustic sound. In the marine environment, infrasound can propagate over hundreds of kilometres [3], extending well beyond the Offshore Development Area.

Whales and a wide range of other marine organisms, including jellyfish, fish, reptiles, cetaceans, and more, are known to be sensitive to infrasound. Many of these species rely on infrasound for navigation, foraging, social communication, mate attraction, courtship, and territorial behaviour [3].

The Applicants' noise modelling and prediction considers conventional underwater acoustic noise in the 23–8,000 Hz range, with detailed modelling focused on pile driving [7]. Pile driving is predicted to have potentially significant effects on marine mammals and fish, but these effects are temporary and therefore considered

acceptable. Noise from operational turbines and vessels is assessed qualitatively and expected to be low impact. Frequencies below 23 Hz, in the infrasound range, are not explicitly represented in the quantitative modelling tables, introducing a level of uncertainty that the EIA does not fully address.

It is therefore requested that the Applicant undertakes a dedicated assessment of infrasound generation and propagation, including its spatial extent beyond the current study area, and evaluates the potential impacts on marine species known to rely on infrasound.

Moving underwater shadows

The potential impacts of visual cues from offshore wind turbines on aquatic species remain poorly understood, and the underlying physical processes are not yet well characterised. Contrary to assumptions applied in current EIAs for offshore wind turbines, lensing effects caused by surface water waves intensify, rather than attenuate, the contrast created by turbine blade shadows penetrating the water column [3].

Although the Array Area may intersect migratory routes of species such as Atlantic salmon, the marine ecology chapters do not address the potential effects of turbine shadowing on fish or marine mammals [17]. The Applicant provides no clear justification for excluding subsurface moving shadows or visual stimuli arising from rotating turbine blades from the assessment of impacts on marine life. This omission introduces uncertainty regarding the full ecological impact of the Proposed Development on visually sensitive species.

It is therefore requested that the Applicant considers the scoping-out of visual and moving shadow effects on aquatic species, and provides a robust assessment informed by current scientific uncertainty. In the absence of such evidence, a precautionary approach should be adopted to ensure that potential impacts on fish and shellfish receptors are adequately assessed prior to determination.

Changes to Physical and Coastal Processes

The hydrodynamical models applied in the EIA to predict the effects of the Proposed Development on the marine environment solely model through turbine–water interactions (e.g. added drag) [18]. This approach does not account for the influence of the wind farm on near-surface wind fields.

Large offshore wind arrays are known to modify near-surface wind speeds through wake effects, reducing wind velocities and altering turbulence over considerable distances. These changes can influence air–sea exchange processes, including wind stress, wave growth, and vertical mixing, with potential implications for stratification and sediment dynamics beyond the Array Area [19].

The Applicant assumes that the Proposed Development does not alter the atmospheric drivers of the marine system, however [18]. This represents a limitation of the modelling approach, as it excludes a plausible pathway of impact and may lead to an underestimation of the spatial extent and magnitude of changes to physical processes.

It is therefore important that this limitation is clearly acknowledged and justified, particularly in relation to the assessment’s conclusions on physical and coastal processes.

Wind theft

The potential aerodynamic interactions between the Proposed Development and existing or planned wind farms have not been assessed within the submitted application. It is well established that wakes generated by large offshore wind arrays can extend over distances exceeding 100 km downstream, resulting in reductions in

turbine energy yield of up to several tens of percent [3,20]. Such effects, often referred to as “wind wake losses” or “wind theft”, may therefore have a material impact on the operational performance of neighbouring wind farms.

There is potential for interaction of the Proposed Development with nearby developments, including the offshore wind farm Talisk (lease awarded), as well as onshore wind farms on the Isle of Lewis such as Point and Sandwick Wind Farm (operational), Sandwick East Wind Farm (pre-construction), and Stornoway Wind Farm (consented). The absence of any assessment of these interactions represents a significant omission, as potential reductions in power generation and associated economic implications for adjacent projects are material considerations in the consent process.

Furthermore, UK Government guidance encourages a “good neighbour” approach to offshore wind development, including constructive engagement between developers [21]. As part of this, developers are expected to consider wake interactions and, where relevant, undertake assessments to understand the potential impacts of their development on nearby wind farms.

Economic and social Impacts

Work on the nearby West of Orkney Wind Farm has been paused due to the prohibitive cost of the power grid connection (among the highest in the north of Scotland) rendering such projects economically uncompetitive compared with those in England [22]. This raises serious concerns about the viability of the Proposed Development which is further from major demand centres than West of Orkney Wind Farm, as its electricity must travel a much longer distance through onshore and subsea transmission infrastructure to reach the main grid in southern Scotland and beyond.

This consideration occurs alongside substantial constraint payments already borne by consumers for offshore wind farms in the north of Scotland [3], highlighting wider economic implications.

Transmission from the Array Area to where it is needed would require major onshore infrastructure, including extensive cable trenches, substations, and a workers’ camp on the Isle of Lewis. The environmental and social impacts of these works would be significant, causing landscape disruption and affecting local tight-knit communities. Further down the transmission network, Highland Council recently refused planning permission for the Fanellan energy hub near Beauly [23].

A community survey of residents in West Lewis regarding the Proposed Development demonstrates significant local concern with 88% of respondents expressing opposition [24], citing the destruction of Gaelic culture and community, and the absence of any significant benefit to islanders, among other concerns.

Contemplating these factors, it is considered that the cumulative economic and social impacts of the Proposed Development deserve further consideration. The application would benefit from a more detailed assessment of social impacts and economic feasibility before consent is granted.

Decommissioning

Environmental impacts and sustainability

The EIA states that structures above the seabed will be removed but provides limited clarity on the extent of infrastructure that will remain in situ [7]. The Proposed Development includes a range of possible foundation types—monopiles, tripods, jackets, suction buckets, and gravity base structures—which have markedly different seabed penetration depths and footprints [7].

The fate of associated elements, including corrosion protection systems for steel

structures, is also unclear. Partial removal of substructures may result in substantial infrastructure being left within the seabed, with potential long-term environmental implications.

The EIA does not specify how turbine blades will be managed at end of life. Given that turbine blades are composed of composite materials that are difficult to recycle, and that disposal to landfill remains common practice [25], the absence of a defined strategy introduces uncertainty regarding the long-term environmental effects of decommissioning.

This appears inconsistent with the principles of the waste hierarchy, as set out in the Waste (Scotland) Regulations 2012 [26], and circular economy objectives, which seek to prioritise reuse, recycling, and recovery over disposal.

The Planning Authority and Scottish Ministers are therefore requested to consider the adequacy of the proposed decommissioning approach, including the extent of infrastructure to be left in situ, and to require clarity on the management of turbine blades, in line with circular economy principles, prior to the granting of consent.

Financial liabilities

There is a growing concern regarding decommissioning liabilities for UK offshore wind developments. Evidence suggests that some operators may not be fully complying with Government guidance on setting aside funds for end-of-life costs, creating a risk that these liabilities could fall to the public [27].

It is therefore respectfully submitted that any consent for the Proposed Development should require the Applicant to establish and maintain ring-fenced financial security, sufficient to meet the full cost of decommissioning, and in place well before any subsidy support ends.

Mental health

Uninterrupted vistas, expansive open spaces, long views to the horizon, and clear night skies are widely recognised as contributing to the health and wellbeing of communities and visitors, providing well-documented emotional, psychological, and physical benefits. These benefits are often enhanced where landscapes and seascapes remain unspoilt and tranquil [3].

The Outer Hebrides are widely recognised for their high-quality natural environment, with tourism bodies describing the islands as among the last “untouched natural landscapes in Europe”, attracting residents and visitors who value their scenic quality and remoteness [28]. The findings of the Lewis community survey clearly demonstrate widespread concern regarding the serious adverse effects of the Proposed Development on health and wellbeing [24].

The EIA identifies significant visual effects, both during the day and at night, at a number of viewpoints on the Isles of Lewis and Harris, including adverse effects on coastal character, landscape character, and landscape qualities [29]. The Applicant also acknowledges that changes to seascape and coastal views may affect mental wellbeing and a sense of connection to place. The proposed mitigation measures—such as turbine layout, colour treatment, lighting design, and landscaping—primarily address visual intrusion. However, they do not directly address the potential effects on mental wellbeing and place attachment arising from changes to landscape character [29].

Scottish Planning Policy recognises the importance of protecting and enhancing landscape character and the wider environment, including their contribution to the health and wellbeing of communities [30].

It is therefore requested that the Planning Authority fully consider the cumulative effects on landscape, seascape, and community wellbeing prior to the granting of

consent, as these represent material considerations in the decision-making process.
Concluding remarks
The matters set out above indicate that the publicly available project documentation do not provide a sufficiently comprehensive or precautionary assessment of the Proposed Development. Several potentially significant environmental, physical, social, economic, and security-related impacts are either insufficiently assessed, scoped out without robust evidence, or not addressed at all. In several instances, conclusions of negligible or minor impact are reached despite acknowledged scientific uncertainty and the absence of site-specific quantitative analysis.
Given the scale, novelty, and cumulative nature of the development, and the evolving recognition of the marine environment as a complex and vulnerable system, the information currently available is not adequate to support an informed determination. It is therefore considered that consent should not be granted at this stage. A revised application, supported by targeted and up-to-date assessments addressing the identified gaps and adopting a precautionary approach, should be required before the Proposed Development is taken forward.
Thank you for your attention to this objection.

1.1.714 Further Comments

Im just so shocked this is even being considered and pray the right decision is made. If it goes through the impact will be terrible
Thank you

1.1.715 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted documentation reveal that the extent of these impacts has been underestimated, and that a comprehensive heritage assessment, as mandated, has not been conducted. Furthermore, while the proposal identifies effects on the island communities involved, it does not provide any formal assessment of these impacts. The ecological criteria necessary for approval have also not been demonstrated as achievable. Compounding these concerns, the application before the Scottish Ministers does not encompass the entirety of the project.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the accompanying marine licence.

Should the Ministers consider otherwise, it is requested that additional environmental information and enhanced visualisations be sought. Moreover, determination of the applications should be deferred until after a public inquiry, enabling thorough examination of the issues raised within this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and reach clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 173
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications seek approval under section 36 of the Electricity Act 1989 and for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010 respectively. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres of sea. The site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in proximity to the islands and coastal communities of the southern Hebrides.

I request that this letter be registered as a formal objection and that I am notified of the final decision regarding these applications. The grounds for my objection are rooted in both planning and environmental considerations, which I outline below with reference to the statutory and policy framework applicable to the determination of these proposals.

It is important to emphasise that the statutory responsibility to demonstrate compliance with the relevant planning and environmental tests rests entirely with the applicant. Adequate and compelling evidence must be provided by MachairWind Limited to satisfy these requirements. Objectors, including myself, are not obliged to prove the contrary. Upon careful assessment, the applicant has failed to discharge this burden. Consequently, for the reasons articulated in the following sections, the applications do not meet the necessary tests, and consent ought to be refused.

1.1.716 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, resulting in a practical consequence that it cannot be supported under the policy's framework for renewable energy development. While NPF4 Policy 11 endorses renewable energy projects, this endorsement is conditional upon satisfying specific impact criteria, particularly those addressing effects on communities, landscapes, seascapes, and other receptors. The proposal's inability to meet these criteria means it falls short of the policy's intended balance between development and environmental and cultural protection.

Specifically, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns under Policy 11(c) relating to impacts on communities and their heritage. The lack of evidence to safeguard island communities further exacerbates this conflict, indicating that the proposal does not adequately address the social and cultural dimensions integral to the policy's impact criteria.

Additionally, the ecological assessments provided fail to show that the necessary tests can be met, undermining the proposal's compliance with the relevant environmental protections embedded within Policy 11. Taken together, these deficiencies demonstrate a clear conflict with NPF4 Policy 11, thereby undermining the policy's support for the proposed renewable energy development. On this basis, the proposal should not be granted planning permission.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting with key provisions of the National Planning Framework 4 (NPF4). Specifically, it would fail to uphold Policy 11 alongside Policy 4(c) and 4(d), which are designed to protect National Scenic Areas and other nationally important landscapes from impacts that would diminish the qualities for which they are recognised.

Furthermore, the application has not demonstrated that it would preserve the cultural significance of scheduled monuments and their settings, as required by Policy 7, including Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their settings. In addition, there is an absence of evidence showing that island communities would be safeguarded, further undermining compliance with these heritage protection policies.

Lastly, the ecological assessments submitted fail to meet the necessary tests set out in Policy 3 on biodiversity. Taken together, these shortcomings establish that the proposal does not comply with multiple NPF4 policies aimed at protecting nationally important landscapes, heritage assets, and biodiversity. Consequently, the proposal should be refused planning permission.

1.1.717 Seascape, Landscape and Visual Effects

The practical consequence of relying on the visualisation materials submitted is that they cannot fully convey the true scale and visual impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations are inherently limited in replicating the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent corrective tool. Consequently, the visual evidence provided must be treated with caution, as it cannot be assumed to represent an accurate or complete depiction of the development's visual effects. This limitation undermines the reliability of the visual assessment and should be given appropriate weight in the decision-making process.

1.1.718 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships

between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

1.1.719 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are attracted specifically by the qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes form the foundation of the visitor experience and underpin the local economy, making them integral to the viability of these communities. Any alteration to these defining characteristics would therefore have a direct and significant impact on the economic base that sustains these islands.

Such an impact would extend beyond the immediate economic consequences to affect essential local services, population stability, and the overall sustainability of the communities. The interdependence of the economy and social fabric means that changes diminishing the qualities which draw visitors threaten not only financial prosperity but also the continuing viability of these island settlements. It follows that the proposal, by jeopardising the very qualities that attract visitors, poses a fundamental risk to the long-term economic and social sustainability of the island communities.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, providing detailed consideration of potential port communities, but omitting any equivalent place-based examination of the island communities that would be directly impacted. Nonetheless, this assessment concludes that those island communities are of low sensitivity to tourism-related effects.

It is important to recognise that small island economies cannot be accurately represented by regional averages. These economies tend to be highly concentrated in sectors that are particularly vulnerable to alterations in the qualities which attract

visitors. Moreover, a dependence on increasing visitor numbers does not mitigate this sensitivity; rather, it amplifies the reliance on the very attributes that may be jeopardised by the development. Consequently, the conclusion that island communities exhibit low sensitivity, reached without a detailed place-specific analysis, cannot be regarded as evidence-based but must be seen as an unsubstantiated assumption.

Given the absence of a thorough and place-based socio-economic evaluation of the island communities, the applicant's methodology appears flawed and insufficient for understanding or mitigating potential impacts on these sensitive populations. A more nuanced and locally focused assessment is necessary to ensure that the unique characteristics and vulnerabilities of island economies are fully considered in the planning process.

There remains significant uncertainty regarding the proposal's compliance with the necessary policy and statutory duties relating to island communities. This uncertainty stems from a failure to provide the robust socio-economic evidence required by GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities must rest on sound evidence and adopt a precautionary approach where data is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and given due weight through meaningful engagement from the earliest stages of a project through to its conclusion. In this case, the applicant acknowledged the need for particular scrutiny of island communities but has not undertaken the comprehensive assessment necessary to understand the proposal's effects upon them. Consequently, it has not demonstrated that the development is compatible with the sustainability of these communities, nor has it shown that the statutory duties owed to them have been properly discharged. Given these deficiencies, the proposal fails to meet the required planning and statutory standards for the protection and consideration of island communities.

1.1.720 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. The preparation and presentation of these documents indicate a recognition by the applicant that there may be potential adverse effects on the integrity of this protected site as a result of the proposed development. Such documents are conventionally

prepared and provided in circumstances where the possibility of an adverse effect cannot be definitively ruled out. The very inclusion of these materials in the application package is thus a significant feature, reflecting the applicant's acknowledgement of potential environmental impacts that warrant careful consideration.

Moreover, the submission of these derogation and compensation documents operates within the framework that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant. This highlights a degree of uncertainty inherent in the assessment process and underscores the importance of these documents in addressing the requirements for derogation under relevant protection provisions. The compensation plan, focused on the guillemot population, seeks to mitigate potential harm to this protected species, aiming to offset any unavoidable impacts should the development proceed. In this context, the applicant's approach demonstrates an awareness of the statutory and policy obligations concerning protected sites and species, and an intention to comply with those obligations through appropriate mitigation and compensation measures.

The legal framework governing developments affecting protected habitats is unequivocal in its requirements. Under the Habitats Regulations, consent for such developments may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are met. Importantly, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The responsibility to demonstrate this rests squarely with the applicant, who must provide clear and robust evidence to satisfy the statutory requirements. Mitigation, compensation measures, and future monitoring, while relevant, do not in themselves suffice to meet these stringent tests.

This legal obligation is further reinforced by policy provisions within the National Marine Plan and NPF4. Specifically, policies GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4, collectively establish a comprehensive policy framework that complements and supports the Habitats Regulations. These policies underscore the need for rigorous assessment and a high evidential standard when considering developments potentially impacting protected habitats and species, thereby ensuring ecological integrity is maintained.

Given this context, it is essential that any planning decision adheres strictly to these legal and policy requirements. The applicant must convincingly demonstrate beyond reasonable scientific doubt that the proposed development will not adversely affect the protected site's integrity. Without such evidence, consent cannot be lawfully granted. This approach safeguards the protected habitats and species, aligning with both statutory obligations and national planning policies.

The applicant's submission fails to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal an insufficient degree of certainty that the legal requirements can be met, thereby undermining the protections afforded to these ecological features. Given this clear shortfall, the

application does not fulfil the necessary legal criteria, and consent should therefore be withheld.

1.1.721 Cumulative and In-Combination Effects

The current assessment approach submitted to the Scottish Ministers is fundamentally flawed, as only a portion of the overall project—the wind farm itself—is under consideration. Crucially, the export cable corridor and onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to separate future applications. This fragmentation means that the environmental and cumulative effects of the entire project are never evaluated in a single, comprehensive process. Instead, significant components are subject to subsequent consenting procedures following the principal decision, thereby undermining a holistic understanding of the project's impacts.

Such an approach conflicts with established legal principles, as underscored by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being artificially segmented into parts whose individual effects may seem less significant. By salami-slicing the project, the assessment fails to capture the full scope of potential environmental and social consequences, rendering the decision-making process incomplete and procedurally unsound. Consequently, this piecemeal evaluation is contrary to both legal precedent and sound planning practice, and should be reconsidered to ensure a thorough and integrated assessment of all project elements.

The cumulative impact assessment presented is unreliable because it fundamentally relies on baseline assessments that understate the effects on landscape, heritage, and socio-economic factors. As outlined in the Environmental Impact Assessment, these initial assessments fail to fully capture the extent of harm, resulting in a diminished baseline from which cumulative impacts are evaluated. Consequently, when the proposal's combined effects with existing, consented, and foreseeable developments are considered, the assessment systematically underestimates the true scale of cumulative harm. This flawed approach compromises the accuracy and robustness of the cumulative assessment, leading to an unjustifiably optimistic conclusion about the overall impact. Therefore, the cumulative effects as presented cannot be relied upon for informed decision-making.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all

components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.722 Public Engagement, Site Selection and Environmental Information

The applicant's submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant's advantage, having had years to prepare the case with considerable professional and financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage.

Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.723 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes includes some acknowledgement of significant impacts; however, it falls short in fully addressing the scale and nature of these effects, particularly when compared to proposed mitigation measures. For example, while the assessment recognises significant effects at Erraid and on the Core Paths of the Ross, and concedes that Fionnphort—a vital gateway community for visitors to Iona—would experience notable impact, the overall attribution of magnitude remains moderate. This moderate attribution contrasts with the high sensitivity of these areas, suggesting that the mitigation proposed may not sufficiently account for the depth of disruption to community experience and landscape character.

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

Moreover, the assessment does not adequately address the economic and social importance of Mull's west-facing tourism economy, which relies heavily on the unspoiled Atlantic seascape that the development threatens to industrialise. Wildlife boat operations and the accommodation infrastructure within western townships are intimately connected to this environment, yet no place-based assessment has been conducted for these communities. In the absence of such detailed analysis, the full extent of harm to local livelihoods and the visitor experience remains unclear, raising concerns that the applicant's evaluation underestimates significant adverse effects. Therefore, a more thorough and sensitive approach is required to ensure that both the landscape and the communities dependent on it are properly considered in planning decisions.

The applicant's assessment recognises potential effects on several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses Ulva and Staffa. Ulva, a community-owned island undergoing regeneration, is acknowledged as sharing fully in the effects on this designated landscape. However, the assessment notably omits a dedicated evaluation of Ulva itself, despite its reliance on the very qualities of setting and unspoilt seascape that the development could compromise. Staffa, situated approximately 35 kilometres from the development zone, lies beyond the 30-kilometre threshold set by NatureScot for assessing National Scenic Area effects. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, notwithstanding its own recognition of the island's panoramic maritime qualities.

Further afield, the Jura National Scenic Area, located around 28 to 32 kilometres from the site, is assessed as having high sensitivity but is attributed only a medium to low magnitude of effect. This moderation is justified by the applicant on the basis of distance, apparent scale, and retained landforms. Yet Jura's designation fundamentally depends on its wild and undeveloped Atlantic outlook, which may be more vulnerable to change than the assessment suggests. Similarly, the Scarba, Lunga and the Garvellachs National Scenic Area, some 35 to 40 kilometres distant, receives a comparable appraisal, potentially underestimating the significance of effects on these seascapes.

Overall, while the applicant's evidence addresses a range of designated landscapes, it appears to underestimate or omit significant effects on key locations, particularly those with vulnerable communities and distinctive natural and cultural qualities. This raises concerns about the adequacy of the assessment in safeguarding the integrity of these important seaboard landscapes and island communities. Further, more detailed consideration may be necessary to ensure the full implications for these sensitive areas are properly understood and mitigated.

The applicant's assessment characterises the South Tiree coastal area as possessing High sensitivity at a distance of approximately 35 kilometres while attributing a Low magnitude of change to the proposed development. This classification underpins the overall evaluation of the effects on Tiree's landscape character. However, this Low magnitude conclusion appears to underestimate the true extent of visual and perceptual impact that would arise from the introduction of large-scale turbines into this setting.

Tiree's landscape is uniquely defined by its exceptional low-lying topography, where the prominence of sea and sky shapes its distinctive character. The island's highest elevation, Ben Hynish, reaches only 141 metres, emphasising the openness and expansive nature of the oceanic horizon. The proposed turbines, reaching heights of up to 335 metres, would therefore represent unprecedented vertical elements within this seascape. Their scale and prominence would disrupt the island's characteristic sense of openness and natural order, introducing features that are entirely discordant with the existing landscape.

Given this context, the conclusion that the magnitude of change would be Low does not adequately reflect the sensitivity of Tiree's receptor or the scale of change

introduced. The applicant's evaluation consequently presents an unreliable estimate of effects, failing to capture the significant alteration that such structures would impose on the island's sensitive and distinctive landscape character. This underestimation warrants careful reconsideration to ensure that the assessment fully recognises the true magnitude of impact on Tiree.

The applicant's assessment fails to consider significant effects on mainland and island communities that maintain direct visual and economic connections with the seascape of the proposed development. This omission undermines the comprehensiveness of the environmental evaluation and risks overlooking impacts that could materially affect local livelihoods and community cohesion.

Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its potential vulnerability to changes in seascape character. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based visual impact moderation is applied, yet the significance of these views for tourism and local identity has not been adequately addressed.

Furthermore, the chain of communities along the west coast of Kintyre depends on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which define their character and support their visitor economies. The Treshnish Isles, other small islands, and mainland coasts sharing views of the development area are similarly positioned. By excluding these receptors from thorough assessment, the applicant neglects the full scope of potential seascape effects, thereby compromising the robustness of the environmental appraisal. It is essential that these communities be fully considered to ensure a balanced and informed decision-making process.

The applicant's environmental impact assessment applies a distance-based approach that systematically moderates the magnitude of change and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. Taken together, these places demonstrate a single proposition: wherever the applicant's assessment encounters such receptors beyond this threshold, the significance of impacts is diminished, and the communities residing in these areas have not been afforded any place-based assessment. This methodology undermines the integrity of the overall assessment by failing to adequately recognise or evaluate the real and potentially significant effects experienced by distant but sensitive populations.

1.1.724 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The importance of islands in the marine environment in their natural state not industrialised. Local and visiting boats highly value these aspects.

1.1.725 Further Comments

We have visited the area by boat numerous times and will continue to do so. The environment, history, wildlife are so important in both the lives of the local inhabitants and of visitors. The proposal and associated plans would be so destructive.

1.1.726 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant's documentation reveals that these adverse effects have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although the impacts on the island communities within the project's influence were identified, they have not been adequately assessed. Furthermore, the ecological criteria mandated by policy have not been demonstrated as achievable. It is also important to note that the application submitted to the Scottish Ministers only covers a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, and to decline the associated marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations to better inform their decision. I further advocate that the application be subjected to determination only following a public inquiry, providing a forum in which the concerns raised here can be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address the impacts on cultural heritage and the island communities within their decision statement.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 174
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications are made by MachairWind Limited, trading as ScottishPower Renewables. I request that this letter be recorded as a formal objection, that I be registered accordingly, and that I am kept informed of the decision regarding these applications.

The development in question seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The project would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site lies within a Windfarm Development Area covering about 448 square kilometres of marine space, located north-west of Islay and west of Colonsay. It is situated roughly 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The following discussion outlines the planning and environmental grounds underpinning my objection, framed within the relevant statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely on the applicant to provide sufficient evidence demonstrating compliance with the applicable regulatory and policy tests. Objectors are not required to disprove the application; rather, the applicant must satisfy the decision-maker that all criteria are met. In this case, the evidence supplied by the applicant falls short of that requirement, and therefore, consent ought to be refused.

1.1.727 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities; Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets; and Policy 3 on biodiversity. The submitted evidence demonstrates that the proposal would result in significant adverse impacts on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the ecological assessments required under Policy 3 have not been satisfactorily met. Taken together, these failures establish clear conflicts with the relevant NPF4 policies intended to safeguard designated assets.

1.1.728 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease. Nevertheless, analysis of the applicant’s Chapter 16 and Appendices 16.1 to 16.3 reveals a clear pattern: no

highly sensitive receptor situated more than approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This indicates a de facto limitation embedded within the assessment, constraining the recognition of significant impacts to receptors within this 20-kilometre radius.

Further scrutiny of the applicant's own documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area located over 30 kilometres from the development is judged to experience only a small scale of change due to viewing distance. Similarly, the Landscape Character synthesis categorises impact magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude precisely at distances where the most sensitive designated landscapes are found results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual evidence provided. According to this guidance, printed visualisations cannot fully replicate the scale that a viewer experiences in the field. This acknowledgement underscores that such visual materials offer only an approximation of real-world perception rather than a precise or comprehensive representation.

Furthermore, wireline drawings included within the panoramic projections share these same constraints. As technical renderings embedded within the visualisations, they do not serve as independent correctives but rather reflect the limitations of the accompanying photographic images. Consequently, while these materials assist in understanding potential visual impacts, their interpretive value must be considered within the context of these acknowledged technical and perceptual shortcomings.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.729 Cultural Landscape, Archaeology and Historic Environment

Compared to the recognised Historic Environment Scotland methodology, which mandates a clear evaluation of how changes to setting affect the contribution setting makes to the cultural significance of historic assets and requires an explicit assessment of whether the integrity of setting is retained, the applicant's assessment falls short. While the methodology emphasises that visual change alone should not be equated with adverse impact, it nonetheless insists on an evaluative step that goes beyond merely describing visual alterations. This step is essential to ensure that conclusions about heritage impacts are founded on a robust understanding of setting's cultural significance and integrity.

However, a Methodological Audit prepared in support of community objections has demonstrated that the applicant's operational assessment does not fulfil this requirement. Although the assessment identifies relevant heritage attributes and discusses factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been evaluated in accordance with the adopted methodology. The absence of this crucial evaluative step undermines the reliability of the applicant's conclusions that the integrity of setting is adequately retained, thereby calling into question the overall validity of the heritage impact assessment.

The practical consequence of the applicant's current heritage assessment is that it risks underrepresenting the full extent of cultural impacts arising from the proposed development. This is because the baseline acknowledges that the affected heritage assets derive their significance not only from static features but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. The relationships between monuments, the sense of spirituality, and the connection to the surrounding landscape and seascape are integral to understanding the heritage value, and these qualities are experienced dynamically rather than from fixed viewpoints.

The applicant's methodology, however, appears to rely predominantly on conventional fixed viewpoints, which may fail to capture this broader cultural landscape and the sequential experience of the heritage assets. This limitation was highlighted by Historic Environment Scotland in their consultation responses, which

are recorded within the application documentation. They specifically requested additional viewpoints to ensure that the wider experiential qualities and the interconnectedness of the heritage assets are properly represented in the assessment process.

In light of this, it is essential that the heritage impact assessment is expanded to incorporate these broader cultural and experiential dimensions. Without this, the assessment cannot fully inform decision-makers of the potential harm to the cultural significance that derives from movement and relationships within the landscape, thereby compromising the ability to appropriately mitigate or avoid adverse effects. A more comprehensive approach would better safeguard the holistic heritage values identified in the baseline and ensure the planning process respects the full character of the affected assets.

The heritage impact conclusions presented rely significantly on the findings of the landscape assessment. According to the evidence, any understatement of landscape effects directly influences and diminishes the accuracy of the heritage conclusions that are derived from them. This interdependence suggests that if the landscape assessment fails to fully capture the extent or significance of the effects, the subsequent evaluation of heritage impacts will inevitably reflect that same understatement.

This reliance raises concerns about the overall credibility of the heritage conclusions. By building upon an assessment that potentially downplays landscape effects, the heritage analysis may not adequately account for the full scope of impacts, thereby undermining its robustness. It is therefore essential that the landscape assessment be thorough and accurate, as deficiencies in this area compromise the validity of the heritage impact conclusions that depend upon it.

There remains significant uncertainty regarding the extent to which the proposed development complies with established policies intended to safeguard heritage assets. This uncertainty is particularly acute in relation to NPF4 Policy 7(h), which addresses scheduled monuments, alongside Policies 7(c) and 7(d), which concern the preservation of their settings. These provisions are further supported by GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. The application’s failure to explicitly address these elements raises concerns that essential policy requirements have not been fully engaged or satisfied.

Critically, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of heritage assets—both those of international and national importance—and their settings will be adequately protected. The absence of a thorough assessment precludes the Scottish Ministers from being in possession of the necessary information to conclude that heritage interests are properly considered and preserved. In light of this, the application falls short of meeting key policy obligations for heritage protection, thereby undermining its overall acceptability. It is therefore appropriate that the application be refused on these grounds.

1.1.730 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic foundation of the island communities, which rely heavily on visitors drawn to their unique landscape, seascape, cultural heritage, tranquillity, and remoteness. These qualities, as identified by the applicant's own baseline assessments, are precisely what attract tourism, the primary source of income for these communities.

Any alteration to these defining characteristics would undermine the visitor appeal, leading to a decline in tourism revenue. This reduction would not only affect local businesses but would also jeopardise essential services that depend on a stable population supported by a viable economy.

Ultimately, the loss of visitor-attracted qualities risks the social sustainability and long-term viability of the island communities. Protecting these intrinsic attributes is therefore fundamental to preserving both their economic health and community well-being.

When comparing the applicant's approach to mitigation, it becomes clear that their socio-economic assessment falls short, particularly in its treatment of island communities. While the assessment offers detailed analysis of potential port communities at a regional level, it neglects to undertake an equivalent place-based evaluation of the island communities directly facing the development. This omission is especially concerning given that the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these island communities. Despite this recognition, no specific assessment of the habitability or the unique conditions of the affected islands was carried out, undermining the robustness of the socio-economic conclusions presented.

Furthermore, the assumption that island communities are of low sensitivity to tourism effects is not supported by evidence but rather reflects a lack of place-based analysis. Small island economies differ substantially from regional averages; their economies are often concentrated in sectors highly exposed to changes in the attributes that attract visitors. This concentration means that reliance on increasing visitor numbers does not diminish sensitivity but instead heightens dependence on the qualities that are potentially at risk from the development. Without a detailed and locally grounded assessment, the conclusion of low sensitivity cannot be considered reliable and risks overlooking significant adverse impacts.

In light of these considerations, it is clear that the socio-economic assessment methodology employed is flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced and place-specific approach is required to accurately capture the vulnerability of these communities and to inform appropriate mitigation measures. Until such an assessment is undertaken, the conclusions regarding the socio-economic effects on island communities must be regarded as tentative and incomplete.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore,

NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.731 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ecological implications of the proposed development, particularly given the presence of Priority Marine Features and Annex I habitats within the area concerned. These sensitive habitats are not only situated within the development site itself but are also part of a wider marine environment that supports diverse species including seabirds, marine mammals, and basking sharks.

The scale and duration of the proposal raise further concerns, as the construction, operational, and decommissioning phases would extend over several decades. This prolonged activity risks causing significant adverse effects to these protected and priority species, whose conservation status underscores the importance of their habitats.

In light of these factors, it is imperative that the ecological sensitivity of the site and its surroundings be thoroughly accounted for in any planning decisions. The potential for environmental harm necessitates a cautious and comprehensive assessment before any progression of the development proposal.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where an adverse effect on site integrity cannot be definitively ruled out. This approach indicates that the applicant recognises the possibility that the Scottish Ministers may reach a different determination regarding adverse impacts than the applicant themselves. Consequently, these submissions serve as an important component of the application, intended to address and mitigate potential impacts under the relevant derogation provisions.

Mitigation, compensation proposals, and future monitoring, while important components of environmental management, do not in themselves satisfy the

stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected habitats. The Regulations mandate that consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are met. This places the burden of proof firmly on the applicant to demonstrate compliance with these high evidential standards. This framework is reinforced by relevant provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Any consent granted without meeting these rigorous tests would be incompatible with the established statutory and policy requirements governing protected habitats and species.

There remains significant uncertainty as to whether the statutory tests designed to protect internationally important habitats and species can be satisfied in this case. On the evidence submitted, including the applicant’s own derogation documents and the degree of certainty they reveal, it is clear that the applicant has not demonstrated compliance with these essential legal requirements. This fundamental failing undermines the justification for granting consent and must weigh heavily against the approval of the application.

1.1.732 Cumulative and In-Combination Effects

The current assessment approach submitted to the Scottish Ministers is fundamentally flawed, as only a portion of the overall project—the wind farm itself—is under consideration. Crucially, the export cable corridor and onshore transmission works, which are indispensable for the wind farm’s operation, have been deferred to separate future applications. This fragmentation means that the environmental and cumulative effects of the entire project are never evaluated in a single, comprehensive process. Instead, significant components are subject to subsequent consenting procedures following the principal decision, thereby undermining a holistic understanding of the project's impacts.

Such an approach conflicts with established legal principles, as underscored by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being artificially segmented into parts whose individual effects may seem less significant. By salami-slicing the project, the assessment fails to capture the full scope of potential environmental and social consequences, rendering the decision-making process incomplete and procedurally unsound. Consequently, this piecemeal evaluation is contrary to both legal precedent and sound planning practice, and should be reconsidered to ensure a thorough and integrated assessment of all project elements.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline

from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

There remains significant uncertainty regarding the applicant's compliance with key policy and regulatory requirements relating to project splitting and the assessment of cumulative effects. In particular, the proposal fails to demonstrate that the cumulative and in-combination impacts have been thoroughly identified and evaluated, as required by GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed within the application, leaving a gap in the understanding of the full scope and consequences of the project. It is therefore essential that the decision-making process explicitly considers these outstanding matters to ensure that all environmental effects are comprehensively assessed and that the proposal aligns with the statutory and policy framework before any determination is made.

1.1.733 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The Environmental Impact Assessment submitted is insufficient to enable the Scottish Ministers to make an informed decision on the application. While the assessment covers a range of topics, it identifies potential significant effects without fully investigating them or employing methodologies that substantiate its conclusions. For instance, the landscape assessment presents outcomes based on a distance pattern not supported by its own stated methodology; the heritage assessment fails to demonstrate application of its integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, the application frequently defers critical evaluation to future stages—post-consent plans, monitoring, and additional approvals—which does not satisfy the requirement under

the EIA Regulations to understand likely significant effects prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that outstanding issues will be adequately resolved later. Consequently, the applicant has not demonstrated that the environmental information provided meets the necessary adequacy standard.

1.1.734 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment predominantly considers Islay in terms of its potential as a direct project location rather than as a distinct affected community. This approach fails to provide a place-based evaluation of the development's effects on Islay's Atlantic-facing communities, whose daily lives and local economy would be directly influenced by the nearest edge of the development area. Consequently, the assessment does not adequately address the considerable and direct impact on the setting, community life, and economic activities of Islay's residents.

For Colonsay and Oronsay, the situation is equally concerning. The islands' seaward outlook, integral to their daily existence, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, which implicitly acknowledges that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, has an open maritime setting that the heritage assessment inadequately addresses, mirroring the gaps identified elsewhere in the application. Collectively, these shortcomings undermine the reliability of the environmental and heritage impact evaluation for Islay, Colonsay, and Oronsay, as the applicant's assessment does not sufficiently capture the direct and significant effects on these island communities, their economy, and their heritage assets.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the

thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

While the applicant acknowledges certain significant effects on the Ross of Mull South coastal area, Erraid, and Fionnphort—key locations linked to visitor flows and community experience—the proposed mitigation does not sufficiently address the extent of visual and economic impacts on these sensitive areas. Notably, although the Ross of Mull South is assessed as having high sensitivity with significant effects accepted at distances of approximately 22 to 24 kilometres, the magnitude attributed remains only medium. Similarly, within the Loch na Keal National Scenic Area, characterised by high sensitivity over distances of 21 to 33 kilometres, the applicant limits the magnitude to medium despite recognising significant effects on Core Paths and local landscapes. This reliance on distance-based reasoning, such as dismissing effects on the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, fails to adequately capture the scale of change and its implications for these designated landscapes.

Furthermore, the applicant's assessment overlooks the broader economic and community consequences for Mull's west-facing tourism economy and its wildlife boat operations, both of which are intrinsically linked to the unspoiled Atlantic seascape that the development would industrialise. The accommodation and livelihood of western townships, which depend heavily on this natural environment, have not been subject to place-based assessment. This omission undermines a comprehensive understanding of the development's impact on tourism-dependent communities whose economic vitality is closely connected to the visual integrity and experiential quality of the coastal and seascape environment. Therefore, the assessment inadequately addresses the significant visual, economic, and community effects on Mull and Ross of Mull, warranting a more thorough and place-specific evaluation.

The applicant's assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area and its constituent islands such as Ulva and Staffa. Ulva, a community-owned island within this National Scenic Area, is at the early stages of regeneration, relying heavily on its unspoilt seascape and setting for recovery. However, the assessment fails to address the specific effects on this small, re-establishing community, despite the fact that Ulva fully shares the effects on the designated landscape. Similarly, Staffa, renowned as one of the most celebrated small islands in Europe and situated approximately 35 kilometres from the development area, lies

beyond the 30-kilometre boundary suggested by NatureScot for assessing effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and not significant, notwithstanding its own acceptance of the island's panoramic maritime qualities.

The Jura National Scenic Area, located approximately 28 to 32 kilometres from the proposed development, is assessed as having high sensitivity but only medium to low magnitude effects attributed to distance, apparent scale, and retained landforms. This moderation, however, appears inconsistent with the designation's emphasis on the wild and undeveloped character of its Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres away, where effects are similarly downplayed.

Taken together, these assessments suggest an underestimation or omission of significant effects on important designated landscapes and the vulnerable island communities that depend on their natural and cultural qualities. The failure to adequately evaluate impacts on Ulva's community and the minimisation of effects on other National Scenic Areas risk undermining the protection intended for these sensitive environments and their associated human settlements. A more thorough and nuanced consideration is therefore necessary to ensure the safeguarding of these valued landscapes and communities.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and landscape impact on the island of Tiree. By attributing a Low magnitude of change to the South Tiree coastal area, despite its designation as of High sensitivity at approximately 35 kilometres distance, the evaluation fails to adequately reflect the scale of alteration that would result from the proposed development. This misjudgement risks misleading decision-makers and the public as to the true extent of effects on this sensitive environment.

Tiree's landscape character is exceptionally distinctive, defined predominantly by the expansive sea and sky that surround it. As a low-lying island with its highest elevation at Ben Hynish of only 141 metres, its open oceanic horizon is a fundamental element of its sense of place. The introduction of turbines reaching heights of up to 335 metres would create vertical structures far exceeding any existing features, thereby fundamentally altering the seascape. The applicant's conclusion of Low magnitude change is therefore incongruous with the island's openness and sensitivity, representing a serious understatement of the visual intrusion and consequent impact.

In light of the above, the assessment's reliability is compromised by this understated evaluation of effects on Tiree's sensitive and distinctive landscape character. A more accurate and robust appraisal is necessary to ensure that the scale and significance of change are properly recognised, thereby informing an appropriate planning decision that respects the island's unique environmental qualities.

While the applicant's assessment includes certain distance-based mitigation measures intended to moderate visual and economic effects, these have not been adequately applied to all relevant receptors. For example, communities such as Gigha, a community-owned island emblematic of island regeneration, face the

development waters directly from the east. Despite the island's finely balanced community and economy, the potential impacts have not been examined, leaving a significant gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent sensitive receptors to which the distance-based moderation referenced in the objection should logically apply. However, the applicant's assessment does not appear to have fully considered the implications for this key visitor destination and its associated economic value.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economies are intrinsically linked to the open Atlantic seaboard, including views toward Islay, Jura, and the surrounding waters. The Treshnish Isles, alongside other small islands and mainland coasts with direct views of the development area, share this position of potential sensitivity. The omission of these communities from a thorough effects evaluation undermines the assessment's ability to capture all significant impacts on mainland and island communities reliant on the seascape, thus compromising the overall robustness of the environmental appraisal.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.735 Personal Observations

In addition to the planning matters above, I am personally concerned because: Our Countryside/Moorlands/Marine environment is being decimated by other Countries seeking green energy, we do not directly benefit from the energy! We choose to holiday in our beautiful country but increasingly seeing the land being torn up in the search for "net zero"! We love the Scottish scenery, but in every direction you look now in the most remote areas you will see a wind farm on the horizon. Destroying carefully conserved areas for false economy is sickening and contributing to global warming. 30% of our countryside should be protected and this is clearly not

happening. These areas rely on tourism, to admire the beauty of the Beaches, sea, marine life. What will be the impact on the local population? The marine environment clearly is being disregarded, other countries do not care about the impact in our Country, “not on their doorstep”. Right?

Based on my own local knowledge, I also wish to highlight that: All of these features need more consideration! nature and conservation is not up for debate!

Finally, I would also ask the Scottish Ministers to consider: Look after your Countryside/Coastal areas. Green energy although being an important goal should not come at the cost of important eco systems which hold large amounts of Carbon, Marine life included. We forget how valuable nature is at storing carbon naturally, and yet we continue to invest millions into industries and infrastructure which will takes decades to balance out to net 0.

1.1.736 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, the analyses published within their documentation reveal a consistent underestimation of the magnitude of these impacts. Crucially, the necessary heritage assessment has not been conducted, and although the effects on the island communities affected were identified, they have never been subject to formal assessment. Furthermore, the ecological criteria required for approval remain unproven, and the application before the Scottish Ministers represents only a portion of the overall project.

In light of these considerations, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the related marine licence application. Should the Ministers decide not to refuse outright, I request that they require the submission of additional environmental information alongside enhanced visualisations. Moreover, I propose that the decision be deferred until after a public inquiry, providing a forum for a thorough examination of the issues raised by this objection. Regardless of the outcome, I further insist that the Ministers explicitly address and articulate their conclusions concerning the proposal’s effects on cultural heritage and the impacted island communities within their final decision.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 175
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which comprise application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this communication be recorded as an official objection, that I be registered accordingly, and that I receive notification of the final determination regarding these applications.

The project under consideration involves the construction and operation of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. These turbines are to be situated within a Windfarm Development Area encompassing roughly 448 square kilometres of marine environment, positioned to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

My objection is founded upon planning and environmental considerations framed by the relevant statutory and policy context governing these applications. It is pertinent to emphasise that the onus lies solely with the applicant, MachairWind Limited (ScottishPower Renewables), to furnish adequate and compelling evidence demonstrating that all applicable statutory tests and policy criteria have been met. There is no requirement for objectors to establish the contrary. Having carefully reviewed the submitted material, I conclude that the applicant has failed to satisfy this evidential burden. Consequently, the applications should be refused consent.

1.1.737 Legislative and Policy Framework

The application fails to demonstrate that reasonable steps have been taken to mitigate adverse effects on natural beauty, flora, fauna, and features of special interest as required under Schedule 9 of the Electricity Act 1989. The applicant’s submission does not adequately address these statutory duties, lacking sufficient evidence of mitigation measures to preserve the identified environmental and heritage interests. This omission is critical given the explicit requirement for both the applicant and the Scottish Ministers to have regard to these considerations in the determination process.

Furthermore, the application exhibits clear deficiencies and omissions in meeting the statutory framework, with no satisfactory demonstration of compliance with the legal obligations to conserve and protect sites, buildings, and objects of architectural, historic, or archaeological interest. Such failures directly conflict with the applicable legal and policy requirements and must weigh decisively against the granting of consent. The absence of robust mitigation and the failure to properly address these statutory duties render the proposal unacceptable in planning terms.

The marine licence application under consideration is required to be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and must comply with Scotland’s National Marine Plan unless relevant considerations indicate otherwise.

The statutory framework explicitly mandates that authorisation decisions adhere to the General Policies set out in the National Marine Plan, which include but are not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish a comprehensive legal and policy baseline against which the application must be rigorously assessed. The application documentation and supporting evidence have not demonstrated compliance with these essential policies, which form an integral part of the statutory assessment process.

Where compliance with the National Marine Plan policies has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such matters must weigh decisively against the granting of consent. In this case, the application fails to provide sufficient evidence to satisfy the requirements of the relevant General Policies, including the need for sound evidence, proper engagement, and consideration of cumulative impacts, as well as protection of the historic environment, natural heritage, and landscape designations. The absence of demonstrated compliance with these statutory policies constitutes a fundamental procedural and substantive defect in the application. Accordingly, the marine licence application should be refused on the grounds that it does not meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to demonstrate compliance with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. As a significant material consideration, the Framework must be applied alongside statutory duties and legislative requirements, yet the application does not provide sufficient evidence to satisfy these policy obligations. This failure to comply undermines the statutory and policy framework intended to protect environmental and heritage interests.

Furthermore, the evidence identifies clear deficiencies and omissions in the application’s assessment and justification against the relevant policies of the Framework. Where such non-compliance and conflicts with legal and policy requirements exist, they weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not meet the mandatory standards set out in National Planning Framework 4.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) as required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making authority cannot properly evaluate the environmental consequences of the development, undermining the statutory process designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which necessitate a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The failure to demonstrate compliance with these regulations is a critical omission, as it prevents the proper consideration of potential adverse impacts on designated habitats and species. Without this assessment, the proposal conflicts with the legal framework established to protect biodiversity and maintain the integrity of protected sites.

Given these deficiencies and omissions, the evidence clearly indicates non-compliance with both the EIA and Habitats Regulations. As established in the relevant statutory provisions, where compliance has not been demonstrated or where conflicts with the legal and policy framework exist, these matters must weigh against the granting of consent. Therefore, the application should be refused on the grounds of inadequate environmental assessment and failure to meet the statutory requirements for habitats protection.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement is clear that decision-making must explicitly address and give due weight to the unique needs and circumstances of island populations. The absence of such consideration undermines the integrity of the planning process and the legitimacy of any consent granted.

The submitted evidence does not demonstrate compliance with this legal obligation. There are identifiable deficiencies and omissions in the assessment of the proposal's impact on island communities, indicating a failure to meet the statutory standard. This lack of proper evaluation conflicts directly with the applicable legal and policy framework established by the Islands (Scotland) Act 2018.

Given these shortcomings, the proposal cannot be regarded as compliant with the statutory duty to consider island communities' interests. As established by the evidence, where such compliance is not demonstrated, these failures weigh decisively against the granting of planning consent. Accordingly, the application should be refused on this basis.

The practical consequence of the applicant's failure to discharge the evidential burden of proof is that the application cannot be considered compliant with the relevant legal and policy requirements, thereby undermining the basis for granting planning consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers have a clear and reliable evidential foundation upon which to assess the proposal's lawfulness and policy conformity.

In this case, the applicant has not met this essential evidential standard. The submitted documentation and supporting evidence fail to establish compliance with all relevant legal and policy frameworks. There are identifiable deficiencies and omissions within the evidence presented, which have not been adequately addressed or remedied. Moreover, certain aspects of the proposal conflict with

statutory duties and planning policies, as evidenced by the absence of demonstrable conformity in the applicant's submissions. These shortcomings are material and substantive, directly impacting the integrity of the planning assessment process.

The absence of comprehensive and convincing evidence to prove compliance means that the application falls short of the statutory and policy requirements that govern the planning system. As established in the approved evidence, where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. The applicant's failure to provide the necessary evidential assurance precludes the possibility of lawful approval.

In conclusion, the applicant has not fulfilled the requisite evidential burden to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment obligations. This failure constitutes a fundamental flaw in the application, which, in accordance with established legal and policy principles, necessitates refusal of planning permission.

1.1.738 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. While NPF4 Policy 11 endorses such development, this support is explicitly conditional upon adherence to its impact provisions, including Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) addressing impacts on landscape, seascape, and other receptors. The proposal does not satisfy these criteria and consequently conflicts with the policy's requirements.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, a matter of considerable weight in the planning balance. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments submitted fail to confirm that the necessary environmental protections can be achieved. Taken together, these shortcomings establish a clear conflict with NPF4 Policy 11's impact tests, indicating that the proposal should not attract policy support.

The applicant's evidence acknowledges that Policy 11 operates in conjunction with several other critical provisions within NPF4, notably Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on their defining qualities. Additionally, Policies 7(c), 7(d), and 7(h) provide protection for scheduled monuments and their settings, while Policy 3 addresses biodiversity considerations. Together, these policies establish a comprehensive framework for the protection of designated assets at the national level.

However, the proposal under consideration does not satisfy these policy requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities that justify their protected status. Moreover, the applicant has not demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor has there been adequate evidence to confirm that the interests of island communities would be safeguarded. These shortcomings indicate a failure to respect the statutory protections afforded to these assets.

Furthermore, the ecological assessments submitted have not proven that the relevant tests under Policy 3 can be met. Without robust evidence to support the claim that biodiversity interests will be maintained or enhanced, the proposal falls short of compliance with national policy. In light of these concerns, the proposal conflicts with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be considered acceptable in its current form.

There remains uncertainty as to how the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. On land, the proposal would adversely affect landscape, heritage, and community interests that these policies are specifically designed to protect. Consequently, it is evident that the proposal conflicts with both the local development plan and the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to dispel these conflicts, and therefore the proposal cannot be regarded as compliant with the relevant development plan policies.

1.1.739 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is that it systematically underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Although the methodology outlined in Appendix 16.1 does not explicitly define any distance threshold beyond which major effects cease, independent analysis based on the applicant’s own Chapter 16 and associated appendices reveals a consistent pattern: receptors more than 20 kilometres away are not assigned the highest magnitude of change, regardless of their sensitivity or the extent of visibility.

This implicit distance-based moderation is further confirmed by the applicant’s own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where designated landscapes are located. This calls into question the reliability of the

conclusions presented to the Scottish Ministers, as the methodology does not accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

The visualisation materials submitted in support of the assessment exhibit inherent limitations that have a direct impact on the accuracy of the perceived scale and visual effects of the proposed development. These limitations mean that decision-makers and consultees cannot fully rely on the visual evidence as a precise representation of how the development will appear in situ. Consequently, there is a risk that the visual impact may be either underestimated or misinterpreted, which could affect the robustness of any conclusions drawn from these materials.

NatureScot's visualisation guidance, which the applicant has adopted, explicitly recognises these constraints. It states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings that are presented within the same panoramic projections share the limitations inherent in the accompanying photography. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to overcome the fundamental shortcomings of photographic representation.

Given these acknowledged technical and perceptual limitations, it is essential that the assessment's reliance on these visual materials is appropriately tempered by an understanding of their constraints. This ensures that decisions are not made solely on visualisations that cannot fully convey the real-world experience of the development's scale and presence within the landscape. In light of this, further consideration or supplementary means of assessment may be necessary to provide a more comprehensive understanding of the visual impact.

While mitigation measures may seek to minimise the visual impact of the proposed development, the introduction of aviation and navigation lighting represents an unavoidable change to the night-time seascape character. Currently, the sea horizon is unlit, and the permanent addition of such lighting over the 35-year operational period would fundamentally alter this aspect of the seascape. It is important to note that the operational lifespan does not confine the extent of harm in planning terms; consenting to the development effectively signifies acceptance that this seascape is appropriate for wind farm use. Therefore, despite potential mitigations, the development would result in a lasting and significant transformation of the night-time seascape character.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes, resulting in unacceptable effects that have not been properly justified. Specifically, the impacts identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite these clear policy triggers, the applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed. This lack of methodological consistency undermines confidence in the conclusions presented. Moreover, there is no adequate demonstration that the proposal complies

with the relevant policies protecting nationally important landscape and seascape interests. In light of these deficiencies, the proposal cannot be considered to meet the necessary policy standards and should therefore be refused.

1.1.740 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

The applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not

fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The heritage impact conclusions rely substantially on the findings of the landscape assessment. However, as identified in the evidence, there is an understatement of landscape effects within that assessment. This understatement directly affects the heritage conclusions, causing them to inherit the same deficiencies. Consequently, the credibility of the heritage impact assessment is undermined by its dependence on a landscape analysis that does not fully capture the extent of landscape effects.

The application fails to demonstrate compliance with key elements of national policy designed to safeguard heritage assets of international and national importance, notably falling short of the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) on their settings. It also does not satisfy the provisions of GEN 6 or the guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. This represents a significant shortcoming given the weight these policies afford to the protection of cultural significance.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their surrounding settings will be preserved. The absence of a thorough and conclusive assessment leaves a substantial gap in the information necessary for the Scottish Ministers to make an informed decision. Without this, the potential adverse impacts on these irreplaceable assets cannot be properly understood or mitigated.

In conclusion, the failure to meet these essential policy requirements fundamentally undermines the acceptability of the proposal. It is therefore incumbent upon the decision-making authority to refuse consent on the basis that the protection of nationally and internationally important heritage assets and their settings has not been satisfactorily demonstrated or guaranteed.

1.1.741 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.742 Ecology, Biodiversity and Habitats Regulations

The development area is characterised by the presence of Priority Marine Features and Annex I habitats, indicating its high ecological value. These sensitive habitats lie within the site itself, while the surrounding waters serve as important environments for a range of protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its environs as an area of significant ecological importance and sensitivity.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this delicate marine setting over a prolonged period, spanning several decades. Given the scale and duration of the proposal, there is a considerable potential for significant adverse environmental effects on the Priority Marine Features and the protected species that the surrounding waters support. Such impacts warrant careful and thorough consideration to ensure the protection of these important ecological assets.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan constitutes a critical element in the assessment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area. These documents acknowledge the possibility that the proposed development may affect the integrity of this protected site, specifically targeting the guillemot population, and are indicative of the applicant's recognition that such impacts cannot be definitively excluded at this stage. By preparing these documents, the applicant is addressing the requirements set out under derogation provisions, which are invoked when adverse effects on a protected site are uncertain but cannot be ruled out. It is important to note that, as per the applicant's own position, the Scottish Ministers retain the discretion to reach a different conclusion regarding the presence or absence of adverse effects on site integrity. Therefore, the submission of these derogation and compensation documents is both a procedural necessity and a substantive acknowledgment of potential environmental risks associated with the proposal. This measure should be seen as an integral part of the application, reflecting a responsible approach to managing possible impacts on protected ecological interests.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has determined that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is imperative that no reasonable scientific doubt remains regarding the absence of adverse effects. This high evidential standard places the onus firmly on the applicant to demonstrate compliance; importantly, proposed mitigation, compensation measures, or future monitoring cannot, in isolation, substantiate that the statutory tests have been fulfilled. This legal framework is reinforced by the provisions of the Habitats Regulations, alongside GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Consequently, any planning consent must be underpinned by robust, conclusive evidence to satisfy these overlapping statutory and policy requirements.

The evidence submitted by the applicant, including their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. These documents

themselves reflect a level of uncertainty that undermines confidence in the applicant's assertions. The statutory framework requires clear and convincing evidence that the requisite conditions for derogation are met, and the applicant's materials fail to provide such assurance. Without this, the legal safeguards intended to prevent harm to critical ecological features remain inadequately addressed.

This failure to satisfy the statutory tests has substantial implications for the assessment of the planning application. The protections afforded to internationally important ecological assets are not mere formalities but essential components of environmental stewardship and legal compliance. As the applicant has not demonstrated that these tests can be met, the basis for granting consent is fundamentally compromised. Consequently, the application should not be approved in its current form, as doing so would contravene the statutory protections and potentially cause irreparable harm to the designated habitats and species.

1.1.743 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it fragments the development, undermining a comprehensive evaluation of its overall impacts. Only a portion of the project is presently before the Scottish Ministers, while critical components such as the export cable corridor and the onshore transmission works are deferred to subsequent applications. Given that these elements are essential for the wind farm's operation, their exclusion from the principal assessment means that the effects of the entire project are never considered collectively. This piecemeal method contradicts the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts may appear less significant. Consequently, the current assessment fails to provide a holistic understanding of the project's full environmental and planning implications, rendering the decision-making process incomplete and procedurally unsound.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide a reliable measure of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the assessment is grounded in baseline evaluations that have themselves understated key impacts on the landscape, heritage, and socio-economic factors. As a result, the cumulative assessment does not fully capture the extent of harm that may arise from the collective developments in the area.

This issue stems from the fact that the cumulative assessments are dependent on conclusions drawn in other parts of the Environmental Impact Assessment. If those underlying assessments begin with a reduced baseline—one that does not adequately recognise the existing conditions and potential sensitivities—then the cumulative effects are inevitably minimised. In other words, any initial understatement of impacts is carried forward, meaning the aggregation of developments appears less significant than it truly is.

Therefore, the cumulative impact assessment as presented cannot be relied upon to inform sound planning decisions. Without an accurate baseline and a thorough

evaluation of combined effects, there is a clear risk that the overall consequences for the environment and community are underestimated. This undermines the robustness of the Environmental Impact Assessment and suggests the need for a more comprehensive and accurate approach before the proposal is approved.

The applicant's submission fails to meet the mitigation requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), particularly regarding the assessment of cumulative and in-combination effects. Unlike the standards expected under the EIA Regulations to prevent project splitting, the proposal does not provide a reliable identification or comprehensive assessment of the project's overall environmental impact. This omission undermines the ability to compare the mitigation measures effectively and assess their adequacy in addressing the full scale of potential effects.

Furthermore, the application does not explicitly consider the implications of deferred works within its assessment, which is essential for a robust determination. Without a clear and thorough evaluation of these deferred components, the decision-making process lacks a complete understanding of the project's cumulative environmental consequences. It is therefore requested that the treatment of deferred works be expressly addressed to ensure full compliance with planning policies and regulatory requirements before any approval is granted.

1.1.744 Public Engagement, Site Selection and Environmental Information

The consultation process for this proposal has demonstrably failed to achieve the standards required for effective public participation, thereby undermining the legitimacy of the site-selection process. The applicant places significant weight on the site-selection procedure, making the quality of public engagement at that stage directly material. However, deficiencies evident during the plan and site-selection phases have persisted into the application stage. The application itself comprises several thousand pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant's extensive preparation time and substantial professional and financial resources. Moreover, GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention require that affected parties be afforded a realistic opportunity to participate in decisions of such magnitude. The conditions imposed on the local communities fall short of this standard, a matter that the Scottish Ministers must give due weight to when considering the representations submitted.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-

economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.745 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request

for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

The applicant's assessment fails to adequately address the practical consequences for the communities of Mull and Ross of Mull, particularly those whose livelihoods depend on tourism and the unspoiled coastal environment. Fionnphort, as the gateway to Iona and the primary embarkation point for visitors, is identified by the applicant as significantly affected, yet no tailored, place-specific mitigation or engagement appears to have been undertaken for this community directly bound to visitor flows. This omission risks undermining the economic and social fabric of a community reliant on tourism.

Moreover, while the applicant recognises significant effects on Core Paths and local landscape areas across Mull, including Central, South and West Mull, and the Loch na Keal National Scenic Area, these are attributed only Medium magnitude despite the acknowledged High sensitivity of these landscapes over distances ranging from 21 to 33 kilometres. The assessment's reliance on distance-based criteria, as exemplified by its treatment of the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, appears to underestimate the visual and experiential impacts on these highly valued and designated landscapes.

Finally, the importance of Mull's west-facing tourism economy and its associated wildlife boat operations, alongside the accommodation and support of western townships, is not adequately reflected in the assessment. These communities depend on the integrity of the Atlantic seascape, which the proposed development would industrialise, yet no place-based assessment or consideration of their specific economic and cultural reliance has been provided. This lack of detailed, localised analysis undermines confidence that the significant visual, economic, and community impacts on these coastal areas have been properly understood or addressed.

The applicant's assessment recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva's recovery is dependent on the preservation of its

natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This classification underestimates the extent of impact when compared to standard mitigation approaches for similarly sensitive landscapes, where a higher magnitude would typically be acknowledged to reflect the significant visual intrusion and landscape alteration posed by large-scale developments. The failure to align the magnitude assessment with the known sensitivity of the receptor results in a mitigation strategy that is insufficiently robust to address the actual scale of impact.

Tiree's distinctive landscape character, defined by its exceptionally low-lying topography and the dominance of sea and sky, further undermines the credibility of the Low magnitude conclusion. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall represents an unprecedented vertical intrusion into the seascape. This stark contrast between the island's natural horizon and the proposed structures necessitates a reassessment that recognises a greater magnitude of change. The understatement of effects leads to an unreliable evaluation of impacts on Tiree, compromising the integrity of the overall landscape and visual assessment.

The applicant's assessment overlooks significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island renowned as a national symbol of island regeneration, faces the development waters from the east; yet, no examination has been made of how these impacts might affect its delicate community balance and local economy. Similarly, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are closely linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. These areas, along with the Treshnish Isles and other small islands and

mainland coasts with views toward the development, have been excluded from any detailed consideration.

Furthermore, Ardnamurchan Point—the westernmost point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors along the peninsula's length. Such seaward panoramas represent precisely the receptors that the applicant's distance-based moderation approach seeks to diminish, thereby undermining the robustness of the visual impact assessment. By failing to address these key receptors, the assessment compromises its comprehensiveness and risks underestimating the potential adverse effects on communities whose economies and cultural identities depend on the quality of their seascape environment.

There remains considerable uncertainty regarding the applicant's approach to assessing environmental effects at distances beyond 20 kilometres. The evidence indicates a systematic pattern whereby any highly sensitive receptor located beyond this threshold is subject to a moderated magnitude of change and a consequent discounting of the effect's significance. This raises questions about the robustness of the assessment methodology, particularly as it appears to apply a blanket distance-based criterion rather than a nuanced, receptor-specific evaluation.

Such an approach fundamentally undermines the integrity of the environmental impact assessment by failing to undertake a place-based consideration of the communities experiencing these effects. The absence of detailed, location-specific analysis for receptors beyond 20 kilometres means that potentially significant impacts may be overlooked or minimized. Taken together, these observations suggest that the applicant's methodology does not adequately capture the true extent of environmental effects, thereby weakening the overall reliability and credibility of the assessment conclusions.

1.1.746 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements essential for its determination. Notably, the applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documents reveal that these impacts have been understated. Furthermore, the necessary heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal evaluation of these impacts has been undertaken. In addition, the ecological tests that must be met have not been demonstrated as achievable. It is also important to highlight that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to deny the associated marine licence. Should the Ministers be inclined not to refuse the applications outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I recommend that the determination of these applications be deferred until after a public inquiry, allowing for a thorough examination of the issues raised in this

objection. Regardless of the outcome, I also ask the Ministers to provide clear and explicit conclusions in their decision statement regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 176
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed within application numbers 00012385 and 00012386, which seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that my objection be formally recorded and that I receive notification upon determination of these applications.

The development in question involves the construction of an offshore wind farm with a capacity of approximately 2 gigawatts. The project proposes installing between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This installation would occupy a Windfarm Development Area spanning approximately 448 square kilometres of sea, situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. The site lies in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in planning and environmental considerations, which I will outline with reference to the statutory and policy framework applicable to these proposals. It is incumbent upon the applicant to satisfy the relevant legal and policy tests through comprehensive evidence. The onus does not fall on objectors to disprove the proposals. In this instance, the applicant has failed to meet that evidential burden. Consequently, I submit that the applications should be refused consent.

1.1.747 Legislative and Policy Framework

The marine licence application under consideration raises significant uncertainty regarding its compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010. This legislation mandates that authorisation decisions must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The application’s conformity with this overarching legal framework is therefore a fundamental prerequisite for its lawful determination.

A detailed examination of the application against the National Marine Plan’s General Policies reveals critical areas where compliance has not been satisfactorily demonstrated. These policies include GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 with paragraph 4.85 addressing Cumulative Impacts. The application fails to provide adequate evidence or assessment to confirm adherence to these policies, thereby undermining the statutory assessment process.

Given these deficiencies and omissions, the application conflicts with the applicable legal and policy framework. As established by the Marine (Scotland) Act 2010 and reinforced by the National Marine Plan, where compliance is not demonstrated or where evidence reveals shortcomings, such matters must weigh against the granting

of consent. Accordingly, the application should be refused on the grounds that it does not meet the necessary statutory and policy requirements.

The proposal fails to comply with essential policies set out in National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. As a significant material consideration, NPF4 must be applied in conjunction with statutory duties and legislative requirements. The absence of demonstrated compliance with these policies results in a clear conflict with the established legal and policy framework, thereby weighing decisively against the granting of planning consent.

The submitted evidence does not establish that the proposal meets the requirements of Policy 3 concerning biodiversity protection and enhancement. Similarly, the application falls short of satisfying Policy 4's provisions for safeguarding natural places, failing to provide adequate assessment or mitigation measures to address potential adverse impacts. Furthermore, the proposal does not demonstrate conformity with Policy 7, which mandates the protection and appropriate management of historic assets and places, leaving unresolved concerns about harm to heritage significance. Lastly, the application does not comply with Policy 11 on energy, lacking sufficient evidence to confirm alignment with energy efficiency and sustainability objectives prescribed by NPF4.

Given these substantive deficiencies and omissions, the proposal is in direct conflict with the relevant policies of NPF4 and the associated statutory and legislative requirements. The failure to demonstrate compliance or to address identified conflicts and evidential shortcomings means that the proposal cannot be considered acceptable in planning terms. Consequently, these matters must be afforded significant weight in the determination process and constitute compelling grounds for refusal of planning permission.

The proposal fails to provide the comprehensive environmental impact assessment required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any determination. This omission undermines the statutory process designed to ensure informed decision-making and environmental protection.

Furthermore, the application does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the proposal's effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear failure to meet legal obligations intended to safeguard designated habitats and species.

Given these deficiencies and the failure to provide the necessary evidence to demonstrate compliance with both the Environmental Impact Assessment and Habitats Regulations, the proposal conflicts with the relevant legal and policy framework. Such shortcomings must weigh decisively against the granting of consent.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, establishing a legal framework within which proposals affecting island communities must be assessed.

The evidence before the determining authority reveals deficiencies and omissions in how the proposal addresses the interests of island communities. There is no satisfactory demonstration that these interests have been properly identified, evaluated, or balanced in accordance with the Act. Such shortcomings represent a failure to meet the statutory duty imposed by the Islands (Scotland) Act 2018.

Given that compliance with this legislative requirement has not been shown, and that the evidence identifies clear procedural and substantive gaps, these matters must weigh against the granting of consent. The proposal's failure to properly consider and give due weight to island communities' interests is a material planning concern that should lead to refusal.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure means that the application does not meet the essential evidential burden necessary to satisfy the legal and policy frameworks governing the proposal.

As a direct consequence, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, undermines the legitimacy of the application. These shortcomings represent clear conflicts with the applicable legal and policy requirements that must be addressed before any consent can be considered.

In accordance with established principles, where compliance is not satisfactorily proven, such matters must weigh decisively against the granting of planning permission. Therefore, on the basis of the evidential failings presented, the application should be refused.

1.1.748 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in subsections (c), (d), and (e). The proposal under consideration fails to meet these essential criteria, as the adverse impacts it would generate cannot be effectively mitigated to the standard required by the policy. Unlike proposals that demonstrate robust measures to safeguard cultural heritage, ecological integrity, and community well-being, this development lacks convincing evidence of sufficient mitigation to offset its significant negative effects.

Specifically, the proposal would result in substantial harm to nationally designated landscapes and seascapes, undermining their value and character. Furthermore, there is an absence of demonstrated protection for the cultural significance of

scheduled monuments and their settings, raising serious concerns about heritage preservation. The proposal also falls short of ensuring the safeguarding of island communities, a key consideration under Policy 11. Finally, the ecological assessments submitted do not establish that the necessary environmental tests can be met, leaving unresolved risks to biodiversity. Taken together, these deficiencies amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development in this instance.

The proposal must be considered in light of a range of policies within the National Planning Framework 4 that collectively aim to safeguard nationally important landscapes, heritage assets, and biodiversity. As outlined in the applicant's evidence, Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7 addresses the protection of scheduled monuments, particularly through Policy 7(h), and the settings of historic assets via Policies 7(c) and 7(d). Policy 3 further sets out requirements for the conservation and enhancement of biodiversity.

Despite the framework of protections established by these policies, the proposal in question fails to comply with their provisions. The evidence presented demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the very attributes that warrant their protection. Furthermore, there is an absence of satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, a matter of particular concern given the statutory importance of these heritage assets. The proposal also does not show that the interests of island communities, which are often sensitive to such developments, would be adequately safeguarded.

Moreover, the ecological assessments submitted have not established that the necessary tests for biodiversity protection can be met. This shortfall indicates a failure to secure compliance with Policy 3's requirements for ecological integrity and sustainability. Taken together, these points illustrate that the proposal conflicts with multiple relevant NPF4 policies designed to protect designated assets. While recognising the wider context and potential benefits of the development, this conflict raises substantive concerns that weigh against the proposal's acceptability under the current policy framework.

The proposal would cause significant adverse effects on the landscape, heritage, and community interests protected by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts directly conflict with the objectives and safeguards established within these policies, which are designed to preserve the character and integrity of the area.

Such conflicts with the development plan framework are clear and unmitigated. The proposal fails to align with the statutory requirements set out by the local plan, demonstrating an inconsistency that cannot be overlooked. This incompatibility

undermines the policy intent to balance development with environmental and cultural conservation.

In conclusion, the proposal is fundamentally at odds with both the Argyll and Bute Local Development Plan 2 and the broader National Planning Framework 4 when considered in its entirety. The applicant has not provided evidence to demonstrate otherwise, and therefore, the proposal should not be supported.

1.1.749 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, lacks a clearly defined distance threshold beyond which major effects are considered to cease. This omission has a direct practical consequence: the predicted effects reported cannot be regarded as fully reliable. An independently prepared Evidence Note, which critically analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams. Specifically, no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's sensitivity or the extent of visibility. This indicates an implicit, if unacknowledged, distance-based limitation within the methodology.

Further scrutiny of the applicant's own documents confirms the influence of distance in shaping the assessment outcomes. For example, the evaluation of a coastal area over 30 kilometres from the site explicitly states that, due to the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This gradation effectively moderates the magnitude of effect as distance increases, despite there being no formal threshold set out in the methodology.

The consequence of this implicit distance moderation is significant: the protective tests applied within the assessment rely on understated inputs for magnitude at the very distances where the most sensitive designated landscapes are situated. Therefore, the conclusions drawn from the applicant's methodology do not reliably represent the true extent or severity of effects that Scottish Ministers are being asked to consent to. In light of this, the assessment methodology's failure to transparently and consistently account for distance effects undermines confidence in the accuracy and robustness of the predicted impacts.

The applicant's visual evidence is prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to

augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

When considering the impact of the proposed development on the night-time seascape, it is important first to evaluate the potential for mitigation of lighting effects. Aviation and navigation lighting, as proposed, would introduce permanent illumination to an area of sea horizon currently devoid of such lighting. This unlit character is a defining feature of the existing night-time seascape and contributes significantly to its visual and experiential qualities. Mitigation measures may reduce some direct glare or light spill, but the fundamental alteration of the seascape's character due to the presence of fixed lights cannot be fully eliminated.

The proposal would result in the continuous presence of aviation and navigation lighting over a stated operational life of 35 years. This duration, while finite, represents a substantial period during which the seascape would be irrevocably changed. It should be noted that, from a policy perspective, this temporal limit does not negate the harm caused. The decision to grant consent effectively endorses the suitability of this seascape for wind farm use, including the acceptance of lighting impacts as an inherent consequence.

In balancing these considerations, it is clear that while mitigation may lessen some adverse effects, the permanent introduction of night-time lighting fundamentally transforms the character of the seascape. This transformation carries significant weight in the planning balance, requiring careful reflection on the acceptability of such change within the wider policy context.

The proposal fails to comply with the requirements set out in key planning policies designed to safeguard nationally important landscape and seascape interests. Specifically, the identified effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish a clear framework for the protection and sustainable management of such sensitive environments.

Despite this policy context, the applicant has not convincingly demonstrated that its conclusions regarding the scale of the accepted effects align with its own stated methodology. This gap undermines confidence in the assessment's reliability and casts doubt on the extent to which the proposal respects the integrity of the protected landscapes and seascapes. Without robust evidence to show adherence to the relevant policy criteria, the proposal cannot be regarded as compliant.

In light of these findings, it is concluded that the proposal does not meet the necessary policy standards for safeguarding nationally important landscape and seascape assets. Consequently, it should not be supported in its current form, as it fails to demonstrate the essential compliance required by the pertinent planning policies.

1.1.750 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment methodology as applied to the evaluation of heritage impacts in this case. While the applicant states that they have adopted Historic Environment Scotland's recognised approach for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—closer examination reveals shortcomings in its application. This established methodology requires a thorough evaluation not merely of visual changes, but specifically whether such changes affect the contribution that the setting makes to the cultural significance of the heritage asset, including an assessment of whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly advises against equating visual change directly with adverse impact.

However, a published Methodological Audit, prepared independently in support of community objections and relying solely on the applicant's own Appendix 14.3, identifies a critical gap. While the assessment comprehensively describes visual changes—addressing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's accepted methodology. The key evaluative step, which would link these visual changes to any effect on the setting's integrity, is absent in all the worked examples examined by the Audit. Consequently, the conclusions drawn about the integrity of the setting being adequately retained rest on an incomplete and insufficiently substantiated analysis.

In summary, the applicant's assessment does not fully comply with the required methodology, casting doubt on the reliability of its conclusions regarding heritage impacts. This deficiency undermines confidence that the cultural significance and integrity of historic assets have been properly safeguarded.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, notably pilgrimage, arrival by sea, and movement through a living cultural landscape. It highlights the importance of the relationships between monuments, spirituality, and their surrounding landscape and seascape, emphasising that these are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—have requested additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the wider cultural context and experiential dimensions that contribute to the heritage assets' significance. Therefore, further consideration is necessary to properly address these aspects in the heritage impact appraisal.

The practical consequence of relying on a landscape assessment that understates effects is that the heritage impact conclusions drawn from it become inherently unreliable. Where the landscape assessment fails to fully acknowledge the extent or significance of impacts, any subsequent heritage analysis that depends on that assessment will similarly minimize or overlook important consequences. This calls into question the overall robustness of the heritage conclusions presented.

Specifically, as noted in the evidence, the heritage conclusions are explicitly dependent upon the landscape assessment. Therefore, any understatement or omission within the landscape evaluation is inevitably carried forward, resulting in a cumulative understatement of effects on heritage assets. This interdependency means that deficiencies in the landscape assessment do not remain isolated but rather undermine the integrity of the entire heritage impact appraisal.

Given this dependency and the identified understatement of landscape effects, it is essential that the landscape assessment be revisited and revised to accurately reflect all significant impacts. Only then can the heritage conclusions be considered credible and reliable for planning purposes. Without such a reassessment, the current heritage impact conclusions lack the necessary evidential foundation and should not be accepted as robust.

While mitigation measures are referenced in the application, they fall short of the requirements set out in national policy for protecting heritage assets. Specifically, the proposal fails to comply with NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) related to the setting of heritage sites, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be safeguarded. Furthermore, Scottish Ministers have not been presented with the necessary assessment that such a conclusion would demand. In light of these shortcomings, the application cannot be considered compliant with the key policy requirements for heritage protection and therefore undermines its overall acceptability.

1.1.751 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant’s own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal’s impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The practical consequence of the applicant’s deficient socio-economic assessment is a failure to properly understand or mitigate the impacts on island communities directly facing the proposed development. Although the applicant’s own consultants acknowledged that habitability could be a significant pathway for effects on these islands, no subsequent assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on

regional-level impacts and provides detailed examination only of potential port communities. Island communities, which are closest to and most likely affected by the proposal, receive no equivalent place-based assessment, yet the report nonetheless asserts that these communities exhibit low sensitivity to tourism-related effects.

This conclusion of low sensitivity is fundamentally flawed because it ignores the distinctive nature of small island economies. Such economies differ markedly from regional averages, as they tend to be highly concentrated in sectors most vulnerable to changes in the attributes that attract visitors. The report's failure to consider these unique local economic characteristics means that the assumed low sensitivity does not rest on evidence but rather on an unsubstantiated assumption. In reality, reliance on increasing visitor numbers exacerbates vulnerability by deepening dependence on the very qualities that the development risks undermining.

In summary, the socio-economic assessment's methodological shortcomings have practical and significant implications. By neglecting a place-based analysis of the island communities, the applicant has not demonstrated a robust understanding of the potential socio-economic consequences. Without this, there can be no confidence that appropriate mitigation measures have been identified or that the adverse impacts on these sensitive island economies will be effectively addressed.

The proposal fails to demonstrate compliance with key policy and statutory requirements designed to protect island communities, thereby undermining the sustainability of those communities. Specifically, it neglects the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Moreover, the proposal does not accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages of the development process through to its conclusion.

Critically, the applicant acknowledged that island communities warrant particular scrutiny; however, no adequate assessment has been undertaken to understand the potential impacts on these communities. The absence of such an assessment means that it has not been demonstrated that the proposal aligns with the principles of sustainable island communities. Consequently, the statutory duties owed to these communities have not been discharged, leaving a significant gap in compliance.

In summary, the failure to provide sound socio-economic evidence, to engage meaningfully with island communities throughout the process, and to meet statutory and policy obligations renders the proposal incompatible with the protection and sustainable development of island communities. This non-compliance fundamentally undermines the proposal's acceptability in planning terms.

1.1.752 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and

basking sharks. This establishes the site as one of considerable ecological importance and sensitivity.

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population of the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively excluded. This submission underscores the applicant's recognition of potential adverse impacts arising from the proposal. Moreover, the inclusion of these documents is a significant feature of the application itself, indicating that, according to the applicant's own reasoning, the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. While the provision of derogation and compensation plans demonstrates a proactive approach to addressing environmental concerns, it also highlights inherent uncertainties about the proposal's impact on the protected guillemot population, warranting careful and thorough consideration.

When considering developments affecting protected habitats and species, it is essential to recognise that mitigation, compensation proposals, and future monitoring measures, while important, are insufficient on their own to satisfy the stringent legal standards required under the Habitats Regulations. Specifically, consent may only be lawfully granted where the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are met. This standard demands that no reasonable scientific doubt remains, placing the burden squarely on the applicant to demonstrate this with robust evidence. Furthermore, this requirement is reinforced by the provisions of GEN 9 and GEN 13 within the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), which collectively underscore the high evidential threshold and precautionary approach mandated in such cases. Consequently, any application must provide compelling and conclusive proof that adverse impacts will not occur, rather than relying solely on proposed mitigation or monitoring strategies, to ensure compliance with both national policy and the Habitats Regulations.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed to approval. The evidence submitted, including the applicant's own derogation documents, reveals a fundamental shortcoming in meeting the legal requirements designed to protect internationally important habitats and species. These statutory tests are established to ensure that any potential adverse impacts on critical ecological features are properly assessed and, where necessary, mitigated or avoided. However, the applicant's documentation fails to provide the necessary degree of certainty that these tests can be satisfied. Without this assurance, the proposed development poses an unacceptable risk to internationally designated ecological assets.

Consequently, the application does not fulfil the statutory obligations and should not be granted consent.

1.1.753 Cumulative and In-Combination Effects

The current approach to assessing the proposed development is fundamentally flawed when compared to established principles of project evaluation and mitigation. Mitigation measures rely on a full understanding of the project's cumulative impacts, yet in this case, only a portion of the development—the wind farm itself—is before the Scottish Ministers. Critical components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are deferred to separate, subsequent applications. This piecemeal consideration prevents a holistic appraisal of the project's overall effects and undermines the ability to implement effective and comprehensive mitigation strategies.

This fragmented assessment approach runs counter to the legal precedent set in Raeshaw Farms, which affirms that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual impacts appear less significant. By deferring key elements to later consenting processes, the decision-making body is unable to consider the full scope of environmental and other impacts at the principal decision stage. Consequently, the assessment is incomplete and procedurally unsound, as it denies a proper cumulative evaluation and impairs informed decision-making on the project as a whole.

The cumulative impact assessment presented is fundamentally unreliable due to its reliance on flawed baseline evaluations. By adopting the conclusions from other sections of the Environmental Impact Assessment, it inherits their understated assessments of landscape, heritage, and socio-economic effects. This initial underestimation directly leads to a diminished foundation for evaluating cumulative impacts.

When these baseline assessments fail to capture the full extent of existing and potential effects, the subsequent cumulative assessment likewise understates the combined impacts of the current proposal alongside other developments that are existing, consented, or foreseeable. Consequently, decision-makers are presented with an incomplete picture that risks undervaluing the true scale of environmental and community change.

Given this, it is essential that the cumulative impact assessment be revisited with accurate and comprehensive baseline data. Only then can the combined effects be properly understood and addressed in the planning process, ensuring decisions are made on a sound and transparent evidential basis.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.754 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and application stages has exhibited significant deficiencies in public participation, which critically undermines the legitimacy of the decision-making framework. The applicant places considerable weight on the site-selection process, rendering the quality of public engagement directly material to the determination. However, the extensive technical documentation submitted spans many thousands of pages, and the consultation period has coincided with the peak months of the year for island communities. During this time, local residents are engaged continuously in the visitor season, while access to specialist advice is notably limited. This disparity is accentuated by the applicant’s prolonged preparation period, supported by substantial professional and financial resources, highlighting an imbalance that compromises effective participation.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage meaningfully in decisions of such significance. The conditions under which the affected communities have been expected to respond fall short of these standards. It is therefore imperative that Ministers give careful consideration to these shortcomings in public participation when evaluating the representations submitted, recognising the impact these procedural inadequacies may have on the fairness and integrity of the site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application constitutes the principal evidential basis for the Scottish Ministers’ determination. However, the issue is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate them adequately or employs methodologies that do not substantiate the conclusions presented. For example, the landscape assessment’s results reflect a distance-based pattern not supported by its own stated methodology; the heritage assessment does not evidence the application of its integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the environmental information provided.

Furthermore, the application relies on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding environmental matters. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Scottish Ministers are obliged to decide based on the evidence currently before them rather than assumptions that unresolved issues will be satisfactorily settled subsequently. The applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision, rendering the EIA insufficient for the purposes of this application.

1.1.755 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation underestimates the effects on local communities, economy, and heritage, thereby undermining the credibility of the overall environmental and heritage impact assessment.

The practical consequence of the applicant's assessment is a substantial underestimation of the visual and social impacts on Iona, which affects the reliability of the environmental and social impact evaluation. The Coastal Character assessment clearly identifies the Sound of Iona as having high sensitivity, with direct orientation towards the proposed development and extensive visibility. The turbines would be visible across a large geographical area, approximately 21 kilometres away, spanning about 39 degrees of the horizon. This significant visual intrusion extends to the West Coast of Iona, also recognised as highly sensitive with widespread visibility. The applicant concedes that residents and visitors throughout much of the island, including those at Dùn Ì—its highest point—would experience

significant effects. Notably, the scale of the turbines is considerable when compared to familiar landmarks; for instance, the tallest turbines would exceed Ben Hynish on Tiree, a 141-metre high landmark seen from Iona at 33 kilometres, by around 194 metres despite being visible at only two-thirds of that distance.

Furthermore, the assessment fails to adequately account for Iona's internationally important monastic heritage, which is intrinsically linked to pilgrimage, arrival by sea, and landscape movement. Historic Environment Scotland's request for additional visualisations, including viewpoints from the ferry crossing and elevated ground such as Càrn Cùl ri Èirinn above St Columba's Bay, has not been met, leaving a critical gap in understanding the heritage impact. Community perspectives further highlight this shortfall: a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal. Despite this, the applicant's own consultants identified habitability as a potential pathway for impact on the community, yet no assessment of this has been undertaken. Taken together, these omissions and understatements compromise the accuracy of the overall impact evaluation and raise serious concerns about the adequacy of the applicant's approach.

The applicant's assessment fails to fully recognise the practical consequences for Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the embarkation point for visitors, is acknowledged to experience significant effects. However, beyond this, the communities whose livelihoods depend heavily on the flow of visitors and the integrity of the local seascape receive insufficient consideration, leaving a critical gap in understanding the development's economic and social impacts.

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, noted for its high sensitivity along 21 to 33 kilometres of coastline, is assessed only at a medium magnitude of effect. Similarly, the Ross of Mull South coastal area, despite its high sensitivity at 22 to 24 kilometres and the acceptance of significant effects at key locations such as Erraid, is downplayed by the attribution of only medium magnitude impacts. This approach underestimates the significance of changes to these designated landscapes, which are central to the character and attraction of the area.

The assessment's reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further diminishes the perceived scale of change. This overlooks the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers, depends fundamentally on the unspoiled Atlantic seascape which this development would industrialise. Crucially, no place-based assessments have been conducted for these communities, resulting in an incomplete evaluation that neglects the true extent of visual, economic, and community impacts.

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located

within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the 30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant's assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

The applicant's assessment concludes a Low magnitude of change for the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly informs the reliability of the overall evaluation of effects on Tiree's landscape. By attributing a Low magnitude of change, the assessment risks underrepresenting the actual scale of impact experienced by receptors on Tiree, which in turn undermines the credibility of any subsequent mitigation measures or planning decisions based on this evaluation.

Tiree's distinctive landscape character is fundamentally shaped by its exceptional low-lying topography and the dominance of sea and sky, with its highest elevation at Ben Hynish measuring a mere 141 metres. In this context, the introduction of turbines reaching up to 335 metres would present vertical elements unprecedented in the island's seascape. Given this stark contrast, the conclusion of a Low magnitude of change appears incongruous and insufficiently reflective of the visual and experiential effects on such a sensitive receptor. This suggests a severe understatement of impact that warrants reconsideration to ensure that the assessment accurately captures the scale and nature of landscape effects on Tiree.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when

considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share this position. The absence of targeted assessment for these locations undermines confidence in the applicant's conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant's environmental impact assessment employs a distance-based methodology which systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors located beyond approximately 20 kilometres from the development site. This approach is evidenced by the observation that where such receptors exist beyond this distance threshold, the assessment reduces the perceived effect magnitude and correspondingly lowers the significance attributed to those effects. Consequently, communities residing in these more distant locations have not been subjected to any place-based assessment, resulting in a lack of detailed consideration of their specific environmental sensitivities and the actual impacts they endure.

This systematic underestimation and discounting of effects beyond 20 kilometres undermines the integrity of the environmental impact assessment as a whole. By applying a generalized distance criterion rather than a nuanced, receptor-specific evaluation, the assessment fails to adequately capture the true extent and significance of environmental effects on sensitive communities outside the immediate vicinity. This methodological limitation not only diminishes the weight given to distant receptors but also neglects the lived experience of those communities, thereby compromising the comprehensiveness and robustness of the environmental appraisal. Such a practice calls into question the reliability of the conclusions drawn and indicates a need for a more rigorous, place-based assessment that fully accounts for effects irrespective of distance.

1.1.756 Personal Observations

In addition to the planning matters above, I am personally concerned because: Intrusive, abhorrent rape of the landscape and marine life. There is also the negative effect on the human aspect of this atrocious plan. As a regular visitor to the area, I

believe that this is not warranted or needed and does not constitute a foreign company coming in to make millions out of a so called climate change situation - if you have got the money, give it to the islands and rural areas for maintaining their own infrastructure.

Based on my own local knowledge, I also wish to highlight that: Everything should be given consideration

Finally, I would also ask the Scottish Ministers to consider: Stop thinking about lining your own pockets!

1.1.757 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant's documentation reveal that the extent of these impacts has been understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 177
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (operating as ScottishPower Renewables), seek authorisation for an offshore wind development with an anticipated capacity of approximately 2 gigawatts. The scheme envisages the erection of between 91 and 144 turbines, each with a maximum tip height of 335 metres, situated within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

I request that my objection be formally recorded, that I am registered as an objector, and that I receive notification of the final determination on these applications.

The following outlines the planning and environmental grounds for my objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the responsibility to satisfy the relevant statutory tests rests solely with the applicant, who must provide adequate and convincing evidence to justify consent. Objectors are not obligated to disprove the proposals. Upon careful consideration of the evidence presented, it is clear that the applicant has not fulfilled this burden. Consequently, the applications should be refused consent.

1.1.758 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness, as identified in the applicant’s own baseline assessments. Any alteration to these defining qualities would directly undermine the economic foundations of these communities. This, in turn, would jeopardise essential local services, diminish population stability, and threaten the long-term viability of the island settlements.

In considering the adequacy of the applicant’s socio-economic assessment of impacts on island communities, it is instructive to compare the thoroughness of the analysis applied to port communities with that directed towards the islands themselves. The assessment in Chapter 18 offers a detailed examination of potential effects on port communities, reflecting a place-based approach that acknowledges their particular circumstances. However, this level of scrutiny is not extended to the island communities directly facing the development, where the assessment remains at a broad regional scale. This inconsistency raises concerns about the reliability of the conclusions drawn, particularly regarding the sensitivity of island communities to tourism-related changes.

The applicant's own consultants highlight habitability as a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the islands was conducted. Instead, the socio-economic evaluation concludes that the island communities exhibit low sensitivity to tourism effects, a determination reached without any place-based analysis. Such an approach overlooks the distinctive characteristics of small island economies, which are markedly different from regional averages. These economies are heavily reliant on sectors that are directly influenced by the qualities attracting visitors. Consequently, increasing visitor numbers do not mitigate sensitivity; rather, they amplify the communities' dependence on attributes that may be vulnerable to change.

Given these considerations, the conclusion of low sensitivity for island communities appears unfounded and is better characterised as an assumption rather than evidence-based. The absence of a tailored, place-specific socio-economic assessment undermines confidence in the applicant's methodology and its capacity to understand or mitigate impacts on island communities adequately. It would be prudent for the assessment to incorporate detailed, island-focused analysis to ensure that the particular vulnerabilities and dependencies of these communities are fully recognised and addressed in the planning process.

There remains significant uncertainty regarding the proposal's compliance with the statutory and policy requirements designed to protect island communities. The National Marine Plan, specifically GEN 19 and paragraph 4.81, alongside NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, establish a clear expectation that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. These provisions explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process. The absence of sound socio-economic data and the lack of a precautionary approach call into question the reliability of the proposal's assessment in this regard.

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.759 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ecological implications of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the development area itself. The surrounding waters are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and

decommissioning activities into this environment over several decades raises significant concerns about potential adverse environmental effects. Consequently, the ecological importance and sensitivity of the site and its environs must be carefully considered to ensure that the proposal does not result in unacceptable harm to these protected marine features and species.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these documents form a critical component of the application's approach to compliance with protection requirements.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.760 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am concerned this will industrialise the seascape. This will make Islay a less attractive place for people to stay or visit. This will greatly impact the economy. Any jobs created will be de minimus in comparison. I am concerned that the energy is being exported to an already full and inefficient grid.

1.1.761 Further Comments

This should not be over ruled at holyrood level.

1.1.762 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own assessments acknowledge substantial impacts on nationally designated landscapes as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant's published documents reveals that these impacts have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities potentially affected were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological criteria set out for the project have not been demonstrated to be achievable. It is also important to note that only a portion of the overall development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence. Should the Ministers determine not to refuse, it is requested that the applicant provide additional environmental information accompanied by enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, thereby enabling a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and conclude on the implications for cultural heritage and the island communities affected within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 178
Dear Sir/Madam,

I wish to formally register my objection to the proposed MachairWind Offshore Wind Farm, which is currently the subject of two applications: application number 00012385 seeking consent under section 36 of the Electricity Act 1989, and application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this communication be accepted as an official objection, that I be recorded as an objector, and that I receive notification of the outcome of these applications.

The project proposes an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 wind turbines, each reaching up to 335 metres in height to blade tip. The development is planned within a designated Windfarm Development Area covering around 448 square kilometres of marine space situated north-west of the island of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in close proximity to other islands and coastal communities within the southern Hebrides.

My objection is grounded in planning and environmental considerations, which are addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies on the applicant to provide comprehensive and compelling evidence demonstrating that all relevant legal and policy tests have been met. Objectors, including myself, are not obliged to establish the contrary. Based on the following detailed reasons, I conclude that the applicant has failed to meet this evidential burden, and therefore consent should be withheld.

1.1.763 Seascape, Landscape and Visual Effects

The applicant’s methodology as set out in Appendix 16.1 notably lacks a defined distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, prepared to support community objections and drawing solely from the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor’s sensitivity or the extent of its visibility. This pattern is further corroborated by the applicant’s own documentation, which explicitly acknowledges the influence of distance in its judgements. For example, an assessment of a coastal area situated over 30 kilometres away states that the scale of change is judged to be small given the viewing distance. Moreover, the Landscape Character synthesis delineates magnitude categories with High magnitude assigned within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types.

This implicit distance moderation has significant implications for the reliability of the assessment outcomes. By systematically reducing magnitude ratings at distances

coinciding with the locations of the most sensitive designated landscapes, the methodology inherently understates the inputs to the protective tests required under planning policy. As a result, the conclusions drawn from the assessment do not provide an accurate or dependable description of the effects that the Scottish Ministers are being asked to consent to. Such an approach risks overlooking or downplaying the true extent of landscape and visual impacts on highly sensitive receptors situated beyond the arbitrary distance markers effectively imposed by the applicant's methodology. In light of this, the assessment's reliability is called into question, and greater scrutiny or revision of the distance-related parameters is warranted to ensure robust and transparent evaluation of potential effects.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations cannot fully capture the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections inherit the same limitations as the accompanying photography; they constitute technical renderings within the visualisation rather than independent corrections to it. This inherent constraint means that any visual evidence must be understood as a representation with acknowledged perceptual and technical boundaries, underscoring the need for cautious interpretation in the planning assessment.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The proposal's failure to comply with key planning policies has tangible consequences for the protection of nationally important landscapes and seascapes. This non-compliance undermines the effectiveness of the planning framework designed to safeguard these valuable environments, potentially leading to significant and unacceptable adverse effects. The practical outcome is that the proposal cannot be supported as it risks causing harm contrary to established policy objectives.

Specifically, the effects of the development engage several relevant policies, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively set out clear requirements to ensure that landscape and seascape interests are preserved and enhanced where possible. The applicant has not shown that the conclusions drawn about the scale of these effects align with the methodology it employs, creating uncertainty and a lack of confidence in the assessment provided.

Moreover, the absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes and seascapes, the planning authority cannot reasonably be expected to grant

consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.764 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

The mitigation measures proposed rely heavily on the findings of the landscape assessment. However, as the landscape effects have been understated, as previously detailed, the heritage impact conclusions that depend on this assessment are similarly compromised. This interdependence means that any deficiency in the landscape evaluation directly undermines the credibility of the heritage conclusions derived from it. Consequently, the overall assessment of heritage impacts cannot be fully relied upon without addressing these fundamental shortcomings in the landscape analysis.

The application fails to provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance

contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets. Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

1.1.765 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

The practical consequence of the applicant's approach is a failure to accurately identify or mitigate significant socio-economic impacts on the island communities affected by the proposal. Although the applicant's own consultants acknowledged habitability as a potentially significant pathway of effect, no subsequent assessment of the habitability of those islands was undertaken. Instead, the socio-economic evaluation presented in Chapter 18 focuses primarily on regional-level analysis, detailing impacts on port communities but neglecting any equivalent place-based assessment of the island populations directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a conclusion that lacks a firm evidential basis.

This conclusion disregards the distinct economic characteristics of small island economies, which are not comparable to regional averages. Such economies are typically concentrated in sectors most vulnerable to changes in the environmental and experiential qualities that attract visitors. Rather than reducing sensitivity, increased dependence on rising visitor numbers intensifies economic vulnerability to any adverse changes. Therefore, the claim of low sensitivity without specific, place-based analysis amounts to an unsubstantiated assumption rather than a reasoned finding. This undermines the reliability of the socio-economic assessment and suggests that the applicant's methodology is fundamentally inadequate to understand or address the impacts on island communities.

The proposal fails to meet essential planning and statutory requirements for assessing and protecting island communities, which raises significant concerns

about its suitability. Without a thorough understanding of the potential impacts on these communities, there is a practical risk that adverse socio-economic consequences may arise, undermining the sustainability and well-being of island populations.

This shortfall directly contravenes established policy and statutory duties. Specifically, the proposal engages provisions set out in GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, the requirements of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 are clear in demanding that the interests of island communities be assessed comprehensively and given substantial weight through meaningful engagement from the earliest stages to project completion.

The applicant acknowledged the need for particular scrutiny of island communities yet failed to carry out the necessary assessments to understand fully how the proposal might affect them. Consequently, it has not demonstrated compatibility with the principles of sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This represents a significant deficiency that should weigh decisively against the proposal's approval.

1.1.766 Ecology, Biodiversity and Habitats Regulations

The proposed development poses a significant risk to the ecological integrity of the site and its surrounding waters due to the presence of Priority Marine Features and Annex I habitats within the development area. These habitats are of recognised conservation importance and are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale construction, operational, and decommissioning activities over several decades would inevitably disturb these species and their habitats, potentially resulting in substantial adverse environmental effects. Given the ecological sensitivity and the scale and duration of the proposed activities, the environmental risks associated with the development are considerable and warrant thorough reconsideration.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when the potential for adverse effects on the integrity of a protected site cannot be definitively ruled out. Their very submission signals the applicant's acknowledgement of possible impacts and the need for measures to address them under derogation provisions.

Notably, the inclusion of these documents indicates that the applicant anticipates that Scottish Ministers might reach a different conclusion regarding adverse effects than the applicant's own assessment. This recognition highlights a degree of uncertainty and underscores the importance of the derogation and compensation proposals as integral components of the application's approach to mitigating potential harm to the protected guillemot population.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

The applicant’s submissions, including their own derogation documents, fall short of demonstrating that the statutory tests designed to safeguard internationally important habitats and species are met. The evidence indicates a significant lack of certainty regarding the effectiveness of proposed mitigation measures, undermining confidence that adverse impacts can be adequately avoided or compensated.

Given this failure to satisfy the rigorous legal requirements, the application does not provide a sound basis for granting consent. Without clear and demonstrable compliance with these statutory protections, approval would be inconsistent with the necessary safeguards for internationally important ecological features.

1.1.767 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm’s operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development’s full implications.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide an accurate picture of the combined effects of the proposal alongside other existing, consented, and foreseeable developments. This arises because the assessment is founded on baseline data from the Environmental Impact Assessment that understates effects across landscape, heritage, and socio-economic factors. As a result, the starting point for cumulative evaluation is already diminished, leading to a systematic underestimation of the true cumulative impacts.

Furthermore, the flawed baseline assessments compromise the reliability of the cumulative impact conclusions. Since each component assessment underreports the degree of harm or change, the cumulative assessment compounds these inaccuracies rather than correcting them. This methodological weakness means that decision-makers are not presented with a robust understanding of how this proposal interacts with other developments, thereby undermining confidence in the planning process and its outcomes.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.768 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process’s legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and

when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.769 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation

underestimates the effects on local communities, economy, and heritage, thereby undermining the credibility of the overall environmental and heritage impact assessment.

The applicant's assessment of impacts on Iona substantially underestimates the scale and significance of visual, community, and heritage effects, thereby undermining the reliability of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The overall effect is classified as Moderate and Significant, with turbines visible across approximately 39 degrees of the horizon over a distance of about 21 kilometres, including from the ferry crossing between Fionnphort and Iona. The West Coast of Iona, similarly, is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors across much of the island, including at Dùn Ì, its highest point. These acknowledged sensitivities suggest that mitigation measures fall short of addressing the breadth and depth of visual impact.

Moreover, the assessment fails to fully consider Iona's internationally important monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, remains unfulfilled, with no visualisation provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Community concerns are also inadequately addressed; a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which was never assessed. The visual scale of the turbines can be contextualised by comparison to Ben Hynish on Tiree, which, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by some 194 metres at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's evaluation significantly underestimates the adverse effects on Iona, warranting a more rigorous and comprehensive appraisal.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based

approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to understate the significance of effects, particularly when considering the scale of potential mitigation compared to the inherent qualities of these areas. For example, while the applicant acknowledges the panoramic maritime qualities of Staffa, located approximately 35 kilometres from the development area and within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant. This conclusion is reached despite Staffa lying beyond the approximate 30 kilometre distance to which NatureScot advised the assessment of effects on National Scenic Area qualities should extend, suggesting that the assessment may not fully account for the broader seascape impact.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

Of particular concern is the omission of any specific assessment of Ulva, a community-owned island within the Loch na Keal National Scenic Area that shares fully in the effects on that designated landscape. Ulva is a small, re-establishing community whose recovery depends on the unspoilt qualities of its setting and surrounding seascape. The absence of dedicated consideration for Ulva's unique social and environmental context undermines the protection of its natural and cultural qualities. Overall, the applicant's approach tends to underestimate significant effects on both designated landscapes and vulnerable island communities, thereby weakening the safeguard of their important attributes.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true scale of impact on Tiree's landscape character. Tiree is an exceptionally low-lying island, its

entire character defined by the dominance of sea and sky, with its highest point, Ben Hynish, rising only 141 metres. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented in Tiree's seascape. Given the island's reliance on an open oceanic horizon as a defining feature, the conclusion of a Low magnitude of change for such an exposed and sensitive receptor is not credible. This underestimation leads to an unreliable overall evaluation of effects on Tiree's distinctive landscape, warranting a reconsideration of the assessment's findings.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This approach effectively reduces the assessed magnitude of change and diminishes the perceived significance of impacts at these greater distances. When compared to standard mitigation practices, which require thorough and place-specific evaluations regardless of distance, the applicant's methodology falls short by not adequately capturing or addressing the full extent of environmental consequences experienced by distant communities.

Taken together, the evidence demonstrates a clear and concerning pattern: wherever a highly sensitive receptor lies beyond the 20-kilometre threshold, the assessment attenuates the magnitude of impact without conducting a detailed, place-based analysis. Consequently, the communities residing in these areas receive no specific assessment of the effects they endure, undermining the integrity and comprehensiveness of the environmental impact assessment. This systematic discounting of significant effects beyond 20 kilometres fails to meet the necessary standards for a robust and equitable evaluation of environmental impacts.

1.1.770 Personal Observations

In addition to the planning matters above, I am personally concerned because: We visit the area for holidays. The beauty of the landscape, the heritage and incredible wildlife are what attracts us. This large scale development will affect all of these and

the communities that live there. This area is special and so should not be defaced by a project that is not going to benefit the community. Tourism and wildlife are going to be seriously affected.

Based on my own local knowledge, I also wish to highlight that: The area us known for the richness and diversity of wildlife- basking sharks, whales white-tailed eagles....Wildlife needs areas where they can have priority over development.

Finally, I would also ask the Scottish Ministers to consider: The proposed development is not suitable for the area. It would be of more benefit to support local efforts for small-scale renewable energy that would benefit the communities living there. Why should these small fragile communities have to carry the burden of large scale development.

1.1.771 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its assessment. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while the effects on the island communities within the project's sphere have been identified, no formal assessment of these impacts has been undertaken. Furthermore, the ecological criteria required by law have not been shown to be met. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for determination.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of additional environmental information and enhanced visualisations. Moreover, I propose that the applications be subject to determination only after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, I further seek a clear statement of the Ministers' conclusions on the effects on cultural heritage and the impacted island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 179
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.772 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This statutory framework explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been met. There is a clear absence of demonstrated regard to the preservation of natural beauty and conservation of important ecological and geological features. The application also lacks sufficient consideration of the protection of heritage assets, including sites, buildings, and objects of architectural, historic, or archaeological significance. Crucially, the applicant has not shown that reasonable steps have been taken to mitigate adverse effects on these protected interests.

Given these deficiencies and omissions, the application conflicts with the applicable legal and policy framework mandated by Schedule 9 of the Electricity Act 1989.

Where such compliance has not been demonstrated, the statutory regime and established planning principles dictate that these matters must weigh decisively against the granting of consent. Accordingly, the application should be refused on the grounds of failure to satisfy the statutory duties under Schedule 9.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The application has not demonstrated compliance with these policies. There are deficiencies and omissions in the evidence submitted, and conflicts with the applicable legal and policy framework remain unaddressed. In particular, the lack of sound evidence as required by GEN 19 and paragraph 4.81 undermines the statutory assessment. Furthermore, the application fails to adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. The absence of sufficient engagement in accordance with GEN 18 further compounds these shortcomings. The failure to properly consider the historic environment, landscape, natural heritage, and co-existence policies indicates a fundamental non-compliance with the National Marine Plan.

Given these unresolved deficiencies and conflicts, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established, where compliance has not been demonstrated or where evidence identifies such shortcomings, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely affect these key environmental and cultural resources. The application lacks sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Similarly, there is no clear demonstration that the historic assets and places impacted by the proposal have been properly considered or safeguarded in accordance with Policy 7. Furthermore, the energy strategy fails to meet the standards required by Policy 11, undermining the framework's objectives for sustainable energy use.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a direct conflict with the applicable legal and policy framework. As established in the framework, where such conflicts and failures exist,

they weigh decisively against the granting of consent. Therefore, the proposal's failure to meet these essential policy requirements necessitates refusal in accordance with the statutory and policy context governing this application.

The proposal fails to meet the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The submitted documentation does not provide a comprehensive environmental impact assessment that satisfies these legal obligations. This omission is critical, as it prevents the determining authority from making an informed decision based on a full understanding of the potential environmental consequences. Without such an assessment, the proposal is procedurally defective and non-compliant with the established regulatory framework governing environmental impact assessments.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a proper Habitats Regulations Assessment means that the potential impacts on protected habitats and species have not been adequately considered or mitigated. This failure constitutes a significant legal and policy deficiency. Given that compliance with these regulations has not been demonstrated, and that the evidence reveals clear omissions and conflicts with the relevant legal and policy framework, these matters must weigh decisively against the granting of consent for the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique circumstances and needs of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or integrated into the decision-making framework. Such deficiencies constitute a clear omission and conflict with the applicable legal and policy framework. In accordance with the established principle that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals shortcomings or legal conflicts, these factors must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the application should be refused.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application.

In this case, the applicant has failed to provide sufficient evidence to confirm compliance with all applicable legal and policy frameworks. The submitted documentation contains deficiencies and omissions that undermine confidence in the proposal's conformity with statutory duties and planning policies. Furthermore, the

evidence presented does not adequately address all environmental assessment requirements, leaving critical uncertainties unresolved.

Where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given the applicant's failure to meet the requisite evidential standard, the proposal cannot be considered compliant with the necessary legal and policy obligations. Accordingly, the application should be refused on the basis that the applicant has not fulfilled the evidential burden required to prove compliance with all relevant statutory and policy requirements.

1.1.773 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects are deemed to cease. Nevertheless, an independently prepared Evidence Note, relying entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a clear and consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This finding is corroborated by the applicant's own documentation, which explicitly acknowledges the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. The practical consequence of this approach is that protective assessments rely on systematically moderated magnitude inputs at distances where some of the most sensitive designated landscapes are situated. As a result, the conclusions drawn from these assessments do not reliably represent the true effects that Scottish Ministers are being asked to consider and consent to.

The practical consequence of relying on the submitted visualisation materials is that they do not fully convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic views share the inherent limitations of the photographs they accompany; these drawings are technical renderings within the visualisation rather than independent tools to correct or enhance the visual accuracy. Therefore, while the materials offer a useful indication of appearance, they should be treated with caution and not be regarded as definitive representations of visual impact.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a

precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.774 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the proposed development's impact on the setting of historic assets does not fully comply with the recognised methodology established by Historic Environment Scotland. While the applicant claims to have adopted this methodology, which necessitates evaluating whether changes to setting affect its contribution to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained, the assessment fails to demonstrate this critical evaluative step. Notably, the methodology explicitly states that visual change should not be directly equated with adverse impact, yet the applicant's analysis appears to overlook this distinction.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, reveals that although the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The Audit finds that the assessment merely describes visual changes and then asserts that the integrity of setting is adequately retained without providing the necessary evaluative reasoning. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness of the assessment overall.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets is deeply rooted in a range of experiential

and landscape qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural qualities are adequately represented. This suggests that the current assessment may not fully capture the holistic nature of the cultural landscape and its intangible attributes. Therefore, it is essential that the assessment methodology be expanded to incorporate these wider perspectives, to provide a more comprehensive understanding of heritage impacts in line with the applicant's own baseline findings and statutory consultees' advice.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

The application engages directly with key national policies concerning heritage protection, specifically NPF4 Policy 7(h) relating to scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, it invokes the provisions of Policy GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a rigorous framework intended to safeguard the cultural significance of heritage assets of international and national importance, ensuring their settings are preserved in the planning process.

Despite the clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers have not been presented with the comprehensive assessment necessary to reach such a conclusion. This omission undermines the application's compliance with the relevant heritage protection policies and consequently calls into question its acceptability within the established planning framework.

1.1.775 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities identified: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not incidental but form the core attraction sustaining the local visitor economy. The proposed development threatens to alter these very qualities, thereby undermining the fundamental reasons why visitors choose to come.

Any diminution of these key characteristics would have a direct and adverse impact on the economic foundations of these communities. This, in turn, would jeopardise the provision of local services, reduce population stability, and ultimately threaten the long-term social and economic viability of the islands. The proposal therefore poses a significant risk to the continued sustainability of these communities by damaging the essential qualities upon which they depend.

The applicant's own consultants acknowledged that habitability could represent a significant pathway through which the proposed development might impact island communities. Despite this recognition, no specific assessment of the habitability of the islands likely to be affected was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, providing detailed consideration of potential port communities but neglecting a comparable, place-based examination of the island communities facing the development. Notwithstanding this omission, the assessment asserts that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without the necessary granular analysis.

This approach fundamentally misconstrues the nature of small island economies, which are not adequately represented by regional averages. Such economies tend to be concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Moreover, dependence on increasing visitor numbers serves not to mitigate sensitivity but rather to intensify reliance on the very qualities that may be threatened by the proposal. Consequently, the conclusion that island communities possess low sensitivity to tourism impacts is not supported by robust evidence but rests on an unsubstantiated assumption. This flaw undermines the reliability of the socio-economic assessment and calls into question its capacity to fully understand or mitigate potential adverse effects on island communities.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal's effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal's compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system's requirements to safeguard island communities effectively.

1.1.776 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats directly within its boundaries, while the adjacent waters serve as habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce extensive construction, operational, and decommissioning activities into this ecologically sensitive environment over a period of several decades, representing a substantial and prolonged disturbance.

Given the presence of these designated habitats and protected species, the scale and duration of the development's impact warrant thorough consideration. The potential for significant adverse environmental effects arises from the disturbance, habitat loss, and cumulative pressures associated with the proposed activities. This underscores the need for rigorous assessment and mitigation to address the ecological importance and vulnerability of the site and its surrounding marine environment.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared to address situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The submission of such materials is therefore a significant element of the application. Notably, the applicant's own approach implies that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. In summary, the applicant's provision of these derogation and compensation documents confirms recognition of possible impacts on a protected site and signals an intention to mitigate these impacts in accordance with derogation provisions.

The applicant's evidence clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future

actions. This framework underscores the necessity for the competent authority to exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.777 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant's extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The practical consequence of the inadequacies in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are currently unable to make a fully informed decision on the application. The environmental information provided does not meet the requirements of the EIA Regulations, which mandate that likely significant effects must be comprehensively understood before determination. This shortcoming directly affects the integrity and reliability of the decision-making process.

The application identifies potential pathways to significant environmental effects but fails to investigate them thoroughly. For example, the landscape assessment produces outcomes based on distance patterns not supported by its own stated methodology, while the heritage assessment does not demonstrate the application of its own integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis of the affected islands, leaving critical contextual information absent. These methodological deficiencies undermine the sufficiency of the environmental evidence.

Additionally, the reliance on future assessments, post-consent plans, monitoring, and further approvals cannot substitute for a complete and robust EIA at this stage. The Scottish Ministers must base their determination on the evidence presently before them, not on assumptions that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this essential purpose, and therefore, the application should not be approved in its current form.

1.1.778 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay's Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of consequences for their local setting, economic activities, or community life. Similarly, Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development. It identifies extensive visibility across a large geographical extent, approximately 21 kilometres, with turbines spanning about 39 degrees of the horizon. The assessment recognises moderate and significant overall effects, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is described as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors throughout much of the island, including at its highest point, Dùn Ì. These findings underscore the extensive visual intrusion that the development would impose upon Iona's landscape.

Beyond visual impacts, the applicant's baseline acknowledges the international importance of Iona's monastic heritage, including the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, such as from the ferry crossing itself; however, the applicant failed to provide visualisations from critical vantage points like the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant

did not assess habitability, despite its identification as a potential pathway of effect on the community. The perceived scale of the turbines can also be demonstrated by comparison with the familiar landmark of Ben Hynish on Tiree—141 metres high and visible from Iona at 33 kilometres—while the largest turbines would overtop Ben Hynish by approximately 194 metres at a closer distance of roughly two-thirds of that span. Taken together, these factors indicate that the applicant's assessment substantially underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment notably relies on distance-based mitigation in addressing the visual impacts on Mull and Ross of Mull coastal communities and landscapes, yet this approach inadequately reflects the true extent of significant effects experienced locally. For instance, although the Ross of Mull South coastal area is acknowledged as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed Medium magnitude effects, the applicant concedes significant impacts at Erraid, on the Core Paths of the Ross, and at Fionnphort—the key gateway to Iona and the principal embarkation point for visitors. This community is intrinsically linked to visitor flows, yet the assessment does not extend to a place-based evaluation of its social and economic vulnerabilities. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area, and the Loch na Keal National Scenic Area, which is of High sensitivity between 21 and 33 kilometres, is nonetheless attributed no more than Medium magnitude. The applicant's characterisation of the Wilderness and Gribun Rocks area, where the scale of change is deemed small due to viewing distances exceeding 30 kilometres, further exemplifies an over-reliance on distance as a mitigating factor rather than a nuanced, site-specific analysis.

This distance-centric assessment framework fails to capture the profound implications for Mull's west-facing tourism economy, which is heavily reliant on the unspoiled Atlantic seascape that the proposed development would fundamentally industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately connected to this landscape quality, yet no dedicated place-based assessments have been conducted for these communities. The absence of such evaluations undermines the understanding of the cumulative and localized economic and community impacts that would arise. In summary, the applicant's assessment inadequately accounts for the significance of visual, economic, and community effects on highly sensitive landscapes and tourism-dependent populations, thereby failing to provide a comprehensive or balanced appraisal of the proposal's true consequences for Mull and Ross of Mull.

The applicant's assessment overlooks significant impacts on key designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration, reliant on the unspoilt seascape and setting that are at risk; yet, no assessment of effects on Ulva has been undertaken. Staffa, also within the same National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range recommended by NatureScot for assessment of National Scenic Area qualities. Despite acknowledging the panoramic maritime

character of Staffa, the applicant concludes that effects would be small and not significant, a conclusion that appears to underestimate the island's sensitivity. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed only as having medium to low magnitude effects at 28 to 32 kilometres, based largely on distance and retained landforms, which does not fully reflect the importance of its wild character. The Scarba, Lunga and Garvellachs National Scenic Area, at 35 to 40 kilometres, is treated in the same way, further indicating a consistent underestimation of effects on these important landscapes.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This conclusion contrasts sharply with the nature of the receptor, as Tiree's landscape character is exceptionally distinctive and vulnerable. Unlike other areas where vertical structures may be more commonplace or mitigated by existing features, Tiree's topography is uniquely low-lying and defined by its openness to sea and sky.

Tiree's highest elevation, Ben Hynish, reaches only 141 metres, while the proposed turbines would rise to 335 metres, introducing unprecedented vertical elements into an otherwise horizontal seascape. This significant alteration to the island's defining characteristics cannot be adequately captured by a Low magnitude rating. Such an understatement leads to an unreliable evaluation of the impacts on Tiree's sensitive landscape character, warranting a reassessment that properly reflects the scale of change proposed.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate visual and economic effects on surrounding communities. However, this approach does not adequately address the unique circumstances of certain mainland and island locations with direct views of the development. For instance, Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters directly to the east, yet the applicant has failed to examine the potential impacts on its delicate social and economic fabric.

Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation claims are applied, yet the assessment does not sufficiently consider how the development might alter this important visual amenity and its associated visitor economy.

Furthermore, the chain of communities along the west coast of Kintyre, whose identity and tourism rely heavily on the open Atlantic seaboard views towards Islay, Jura, and beyond, are equally disregarded. The Treshnish Isles and other small islands with similar outlooks also share this vulnerability. In sum, the applicant's assessment lacks a comprehensive evaluation of these sensitive receptors, thereby undermining confidence in its conclusions and the effectiveness of proposed mitigation measures.

The applicant's environmental impact assessment systematically applies a distance-based approach that results in the moderation and discounting of significant effects

on highly sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the recognised magnitude of change experienced by these receptors, thereby understating the true extent of impact. Such an approach fails to account adequately for the lived experience of communities in these areas, whose exposure to effects is neither fully acknowledged nor assessed on a place-specific basis.

Taken together, the evidence demonstrates that beyond the 20-kilometre threshold, the applicant's assessment consistently reduces the perceived severity of effects, creating a pattern of neglect towards the cumulative and contextual impacts on distant but sensitive locations. This systematic moderation undermines the integrity and completeness of the environmental impact assessment, as it does not provide a thorough evaluation of all potentially affected receptors. Without place-based assessments tailored to the circumstances of each community, the assessment falls short of its duty to comprehensively understand and mitigate environmental harm.

In conclusion, the reliance on a rigid distance criterion to discount effects beyond 20 kilometres compromises the robustness and fairness of the environmental impact assessment. To uphold the standards expected in planning and environmental evaluation, it is essential that significant effects on sensitive receptors, regardless of their distance, receive full and explicit consideration. Only through such rigorous and inclusive assessment can the decision-making process ensure that all affected communities are justly represented and environmental harms appropriately addressed.

1.1.779 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: The government should represent the wishes of the people, this decision is shameful and completely disregards your responsibility to the land, people and its wildlife.

1.1.780 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the applicable statutory and policy requirements. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on coastal communities and their heritage. However, subsequent published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, although detrimental effects on the island communities implicated by the development were identified, no formal assessment of these effects has been conducted. The ecological criteria prescribed by the relevant tests have also not been evidently met. It is also pertinent to note that the application submitted to the Scottish Ministers pertains to only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse both consent for the MachairWind Offshore Wind Farm and the accompanying marine licence. Should the Ministers consider otherwise, it is requested that they mandate the provision of additional environmental information and enhanced visual

representations. Moreover, the determination of the applications should be deferred until after a public inquiry, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and record their conclusions regarding the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 180
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded, that I be registered as an objector, and that I receive notification of the outcome of these applications.

The project under consideration seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The development entails the installation of between 91 and 144 turbines, each reaching a maximum blade tip height of up to 335 metres. The proposed site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The grounds for objection are detailed below, structured in accordance with the pertinent statutory and policy framework that governs the determination of these applications. It is important to emphasise that the onus lies with the applicant to convincingly demonstrate, supported by robust evidence, that all relevant statutory and policy tests are satisfied. Objectors bear no obligation to prove contrary positions. Based on the deficiencies identified herein, it is evident that the applicant has failed to meet this evidential burden, and therefore, consent should be refused.

1.1.781 Legislative and Policy Framework

The determination of the marine licence application under Part 4 of the Marine (Scotland) Act 2010 is subject to strict statutory requirements, including the imperative that authorisation decisions must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The application before the authority fails to demonstrate compliance with several key General Policies of the National Marine Plan, which are integral to the statutory assessment process.

Specifically, the application does not adequately address compliance with GEN 4 (Co-existence), which governs the interaction of marine activities; GEN 6 and paragraphs 4.22 to 4.23 concerning the protection of the Historic Environment; GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas; GEN 9 on Natural Heritage; GEN 13 and GEN 18 on Engagement; GEN 19 and paragraph 4.81 requiring Sound Evidence; and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a significant deficiency in the application.

Moreover, the evidence provided does not satisfactorily resolve these omissions or conflicts with the applicable legal and policy framework. As established by the statutory guidance, where compliance has not been demonstrated or where

deficiencies and omissions exist, these factors must weigh against the granting of consent.

In conclusion, the marine licence application fails to meet the statutory requirements set out in the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The unresolved uncertainties and demonstrable non-compliance with critical policy provisions necessitate that the application be refused.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent.

In this case, the application does not provide sufficient evidence to confirm adherence to Policy 3 on biodiversity, nor does it adequately address Policy 4 concerning the protection of natural places. Similarly, the proposal fails to meet the requirements of Policy 7 regarding the safeguarding of historic assets and places. Furthermore, the submission lacks the necessary demonstration of compliance with Policy 11 on energy, leaving critical uncertainties unresolved.

Given these clear deficiencies and the absence of demonstrated compliance with the relevant NPF4 policies, the proposal conflicts with the applicable legal and policy framework. Consequently, these shortcomings constitute substantive grounds to refuse planning permission.

The proposal fails to meet the fundamental requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects must be fully identified, assessed, and reported prior to any determination. This statutory obligation ensures that decision-makers have a comprehensive understanding of the environmental consequences before consent is granted. The absence of a complete and robust environmental impact assessment undermines this process and contravenes the established legal framework.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the relevant statutory tests. This assessment is critical to safeguard protected habitats and species from potential adverse impacts. The failure to demonstrate compliance with these regulations represents a serious procedural and substantive deficiency. Without clear evidence that the proposal will not harm protected sites, the statutory protections afforded by the Habitats Regulations are effectively disregarded.

Given these significant shortcomings—the incomplete environmental impact assessment and the failure to satisfy the Habitats Regulations' requirements—the proposal conflicts with the applicable legal and policy framework. Where such compliance has not been demonstrated, the law is explicit that these matters must

weigh against the granting of consent. Accordingly, the proposal should be refused on the grounds of inadequate environmental and habitats assessment.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence provided does not show that these interests have been properly identified, assessed, or integrated into the planning proposal. This omission represents a fundamental procedural deficiency, as the statutory duty to consider island communities is not a discretionary matter but a legal obligation that must be fulfilled before consent can be granted.

Furthermore, the absence of any substantive analysis or evidence addressing the specific impacts on island communities constitutes a clear conflict with the applicable legal and policy framework. As established in the Islands (Scotland) Act 2018 and reiterated in the supporting evidence, where compliance with this statutory requirement has not been demonstrated, or where deficiencies and omissions exist, these factors must weigh decisively against the granting of planning consent. Given the failure to properly consider and weigh the interests of island communities, the proposal is contrary to the statutory framework and should be refused.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure to meet the evidential burden is a fundamental deficiency in the application. The absence of such demonstration, coupled with identified omissions and conflicts with the applicable legal and policy framework, constitutes a clear breach of the applicant's responsibility. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's failure to satisfy the requisite legal and policy evidential standards, the application should be refused.

1.1.782 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development; however, such support is conditional upon compliance with the policy's impact criteria. Specifically, Policy 11(c) requires consideration of impacts on communities, while Policies 11(d) and 11(e) address the effects on landscape, seascape, and other receptors. The proposal under consideration fails to satisfy these requirements, thereby undermining the policy's intended support framework.

As detailed in subsequent analyses, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. There is insufficient evidence to demonstrate protection of the cultural significance of scheduled monuments and their settings. Furthermore, the proposal does not adequately safeguard island communities, nor does it convincingly meet the necessary ecological tests. Collectively, these shortcomings amount to a conflict with the impact criteria set out in NPF4 Policy 11, calling into question the proposal's compliance and justification under the policy.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. This outcome directly conflicts with Policy 11 and related provisions within the National Planning Framework 4, which collectively seek to preserve the character and value of National Scenic Areas and other nationally important landscapes. The failure to safeguard these designated assets would erode the very reasons for their recognition and protection under the Framework.

Furthermore, the proposal does not demonstrate adequate protection for the cultural significance of scheduled monuments or their settings, as required by Policy 7 and its subsections. The absence of evidence that these heritage assets would be preserved raises serious concerns regarding the impact on the historic environment. In addition, there is no satisfactory assurance that island communities, which often possess distinct cultural and environmental characteristics, would be effectively safeguarded, contrary to the expectations set out in the Framework.

Lastly, the ecological assessments submitted fail to show compliance with the necessary biodiversity tests outlined in Policy 3. Without clear evidence that these ecological standards can be met, the proposal cannot be deemed consistent with NPF4's commitment to biodiversity conservation. Taken together, these shortcomings establish that the proposal is incompatible with multiple policies designed to protect designated assets of national importance.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These detrimental effects undermine the purpose of the policies designed to protect the terrestrial environment and local character of the area. Consequently, the proposal fails to align with the objectives set out in the development plan framework relevant to land-based considerations.

This inconsistency extends beyond the local plan to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with or justifies departure from these strategic planning policies. As a result, the proposal stands in clear conflict with the established planning policy framework at both local and national levels.

In light of these points, the proposal cannot be supported as it contradicts essential policy protections for the land-based environment within Argyll and Bute. The adverse effects identified and the lack of demonstrable compliance with the development plan justify refusal in accordance with established planning principles.

1.1.783 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to specify a distance threshold beyond which major effects cease, yet analysis of their own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of receptor sensitivity or visibility extent. Furthermore, the applicant's documents acknowledge distance's influence by judging

the scale of change as small at viewing distances exceeding 30 kilometres, with Landscape Character synthesis indicating High magnitude effects within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances corresponding to the location of the most sensitive designated landscapes results in understated inputs to the protective tests applied. Consequently, the conclusions reached by the applicant do not reliably represent the true effects for which Scottish Ministers are asked to grant consent, undermining the robustness and transparency of the assessment's findings.

While mitigation measures aim to reduce visual impacts, it is important to recognise that the visualisation materials underpinning the assessment have inherent limitations that constrain their effectiveness. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully convey the scale perceived by a viewer in situ. Furthermore, the wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings dependent on the photographic base rather than serving as independent corrections. Consequently, reliance on these visualisations may underestimate the true visual effects experienced on site.

The introduction of aviation and navigation lighting to a previously unlit sea horizon would result in a permanent alteration of the night-time seascape character for the entire 35-year operational life of the development. This change is not a minor or temporary effect; it would fundamentally alter the visual experience of the seascape during night hours. Furthermore, the 35-year operational timeframe does not mitigate the policy implications of this harm. Granting consent to this development effectively signifies an acceptance that this seascape is appropriate for wind farm use despite the permanent change in its night-time character. In conclusion, the impact of lighting on the seascape is significant and enduring, and any approval of the scheme must acknowledge the irreversible nature of this seascape transformation.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.784 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty surrounding the reliability of the applicant's assessment of heritage impacts due to apparent non-compliance with the required evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been adopted, which involves evaluating whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the application's conclusions warrant closer scrutiny.

A Methodological Audit, prepared independently in support of community objections and based entirely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed against the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but does not present the necessary evaluative step required to determine the adequacy of setting integrity.

Consequently, the absence of this critical evaluative analysis undermines confidence in the assessment's conclusion that the integrity of setting is adequately retained. This gap raises significant concerns about the robustness and credibility of the heritage impact conclusions drawn by the applicant and indicates that further clarification and methodological adherence are essential before the assessment can be relied upon.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The practical consequence of the identified deficiencies in the landscape assessment is that the heritage impact conclusions derived from it are fundamentally compromised. Specifically, where the landscape effects have been understated, as previously detailed, this understatement directly affects the reliability of the heritage conclusions that rely upon them. In other words, any analysis of heritage impacts that depends on an inaccurate or incomplete appraisal of landscape effects cannot be considered fully credible or robust.

This interdependence between landscape and heritage assessments means that the overall evaluation of the proposal's impact on heritage assets is likely to be overly optimistic. The failure to adequately capture the true extent of landscape effects results in a cascading effect, whereby the heritage conclusions fail to reflect the actual degree of harm. Consequently, decision-makers should treat these heritage impact findings with caution, recognising that their underpinning evidence may not accurately represent the real consequences for the historic environment.

The application fails to comply with key policy requirements intended to safeguard heritage assets. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, Scottish Ministers do not have before them the comprehensive assessment that such a conclusion would necessitate. Consequently, the application does not meet the necessary heritage protection standards and should not be regarded as acceptable in its current form.

1.1.785 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities of landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes directly threatens the fundamental economic foundations of these communities. This economic impact would inevitably undermine local services, diminish population levels, and jeopardise the long-term social and economic sustainability of the islands. Given this dependency, the proposal poses a significant risk to the continued viability of these communities.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic

assessment and the adequacy of proposed mitigations for the island communities concerned.

1.1.786 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The inclusion of these documents demonstrates a clear recognition by the applicant of the potential for negative impacts arising from the proposed development, indicating a proactive approach to mitigating those impacts within the framework of derogation provisions.

Importantly, the submission of these documents constitutes a significant element of the application. It signals that, according to the applicant's own assessment, there remains uncertainty as to whether the Scottish Ministers will concur with the conclusion that no adverse effect will occur. This acknowledgment underscores the gravity of the potential impacts on the protected site and the necessity of considering appropriate compensatory measures. Therefore, while the applicant has taken steps to address the issue, the presence of these derogation and compensation documents highlights the need for careful scrutiny of the application's implications for the North Colonsay and Western Cliffs Special Protection Area before any final decision is made.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not in isolation satisfy the stringent evidential requirements set out under the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected habitat. This high evidential standard places the burden of proof firmly on the applicant, who must demonstrate conclusively that the statutory tests are met prior to consent being lawfully granted. Proposals reliant solely on

mitigation or compensation without clear evidence of their effectiveness in preventing harm fail to meet these rigorous legal thresholds.

This legal framework is further reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e) and 4(f). Together, these policies underscore the imperative to prevent adverse effects on protected species and habitats, embedding the requirements of the Habitats Regulations into national planning policy. Consent decisions must therefore be aligned with these provisions, ensuring that no reasonable scientific doubt remains regarding the absence of adverse effects before development is permitted. This comprehensive approach safeguards environmental integrity while maintaining legal compliance.

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.787 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project's overall effects.

The cumulative impact assessment relies fundamentally on the findings established in the Environmental Impact Assessment, which serve as its baseline. As set out in the applicant's evidence, this baseline encompasses the landscape, heritage, and socio-economic assessments, each of which has been shown to understate the extent of effects. Consequently, the cumulative assessment inherits these initial underestimations, leading to a distorted foundation from which combined impacts are measured.

Given that the initial assessments adopt a reduced baseline, the subsequent cumulative evaluation inevitably reflects this diminished perspective. This means that when the proposal's effects are aggregated with those of existing, consented, and foreseeable developments, the total impact is presented as less significant than it truly is. The reliance on an understated baseline therefore results in the cumulative

effects being correspondingly understated, obscuring the full scope of potential harm.

In light of this evidence, the cumulative impact assessment cannot be regarded as a reliable indicator of the combined consequences of development in the area. Without rectifying the baseline shortcomings, the appraisal will continue to misrepresent the scale of cumulative effects, thereby limiting the ability of decision-makers to fully understand and mitigate adverse outcomes.

The applicant's approach to mitigating environmental impacts is insufficient when compared against the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. Specifically, there has been a failure to reliably identify and assess the cumulative and in-combination effects of the proposal, including the overall effects of the project as a whole. This omission undermines compliance with both planning policies and environmental regulations. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure a comprehensive evaluation of all potential impacts.

1.1.788 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficient consultation process is that affected island communities have been denied a realistic opportunity to engage meaningfully with the site-selection proposals. The applicant requests that Scottish Ministers place significant weight on the site-selection process, yet the quality of public participation throughout this process has been inadequate, undermining its legitimacy. Notably, this deficiency has persisted into the application stage, where the volume and complexity of the technical material—spanning many thousands of pages—have posed an additional barrier to effective public scrutiny.

The timing of the consultation has further exacerbated this issue. It has coincided with the busiest months of the year for island residents, who are engaged continuously in the visitor season and thus have limited capacity to respond. Specialist advice, vital for interpreting the extensive documentation, has likewise been less accessible during this period. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, resulting in a significant imbalance in the capacity to engage fully.

In light of these circumstances, it is important to recognise that GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of such magnitude be afforded a genuine opportunity to participate. The conditions imposed on local communities have fallen short of these standards. Therefore, Scottish Ministers are urged to take these shortcomings into account when considering the representations made, ensuring that the legitimacy of the decision-making process is not compromised by procedural deficiencies.

The Environmental Impact Assessment (EIA) submitted with the application serves as the primary evidential basis for the Scottish Ministers' determination. However, the critical consideration is not the extent of the assessment but its sufficiency. The

application identifies potential pathways to significant environmental effects but fails to investigate them adequately. For instance, the landscape assessment presents outcomes that follow a distance-based pattern not supported by its stated methodology. Similarly, the heritage assessment does not convincingly apply its own integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. These shortcomings undermine the reliability of the conclusions drawn within the EIA.

Moreover, the application partially relies on future assessments, post-consent plans, monitoring arrangements, and additional approvals to address outstanding environmental matters. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. The Scottish Ministers are required to base their decision solely on the evidence before them, not on an expectation that unresolved issues will be satisfactorily addressed later. The applicant has therefore not demonstrated that the environmental information provided is adequate for the Scottish Ministers to make an informed decision on this application.

1.1.789 Effects on Local Area

The applicant's assessment acknowledges that Islay and Colonsay are the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the appraisal principally considers Islay only as a potential direct project location, rather than recognising it as an affected island community in its own right. This approach overlooks the Atlantic-facing communities on Islay, which are situated adjacent to the nearest edge of a 448 square kilometre development area, without any place-based evaluation of the impacts on their local setting, economy, or community life. Such an omission undermines the reliability of the environmental and heritage impact assessment by failing to properly account for the direct and significant effects on the island's population and socio-economic fabric.

Similarly, for Colonsay and Oronsay, the assessment does not adequately address the implications of the development on their seaward outlook, which is fundamental to daily life there. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest concession within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out, further emphasising the potential adverse effects on local biodiversity that are insufficiently explored.

Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies identified in the heritage assessment. In particular, the treatment of its open maritime setting is inadequately considered, thereby compromising the thoroughness and accuracy of the heritage impact evaluation.

Taken together, these factors demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment calls into question

the overall reliability of the environmental and heritage impact evaluation presented within the application.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the

community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, and attempts to evaluate the potential effects of the proposed development on their qualities. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the early stages of regeneration, with a small population whose recovery relies heavily on the integrity of its natural setting and unspoilt seascape. However, the applicant's assessment does not provide a specific evaluation of the effects on Ulva's landscape or community, despite the island sharing fully in the impacts on the designated area.

Regarding Staffa, although located approximately 35 kilometres from the development site—beyond the 30-kilometre radius recommended by NatureScot for assessment of National Scenic Area qualities—the applicant acknowledges the panoramic maritime qualities of the island but concludes that the scale of change would be small and the effect not significant. This conclusion appears to downplay the importance of Staffa's celebrated status as one of Europe's most renowned small islands.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

In summary, while the applicant's assessment acknowledges the presence of these important designated landscapes and their varying sensitivities, it appears to

underestimate or omit detailed consideration of significant effects, particularly with regard to Ulva's vulnerable island community and the cultural and natural qualities of the more distant but highly valued islands such as Staffa and Jura. This raises concerns that the full extent of potential impacts on these landscapes and communities has not been adequately addressed, thereby undermining the protection of their distinctive natural and cultural characteristics.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its High sensitivity, a conclusion that warrants careful scrutiny. When compared to mitigation approaches in similar contexts, such a Low magnitude classification appears incongruous given the distinctive characteristics of Tiree's landscape. The island's topography is exceptionally flat, with its highest elevation, Ben Hynish, reaching only 141 metres. This means that the landscape's defining features are the expansive sea and sky, which together create an open and unobstructed oceanic horizon. Introducing turbines reaching heights of up to 335 metres would impose vertical elements that are without precedent in this seascape, fundamentally altering the visual and experiential qualities of the area. The apparent minimisation of these effects contradicts the sensitivity acknowledged and is inconsistent with mitigation standards applied in comparable sensitive environments.

Furthermore, the Low magnitude conclusion fails to capture the true scale of change and impact on Tiree's sensitive and distinctive landscape character. Given the island's unique reliance on uninterrupted oceanic views and the absence of existing tall structures, the presence of turbines over twice the height of the highest natural point would be visually dominant and intrusive. This significant discordance between the landscape's character and the proposed development's scale demonstrates that the assessment understates the magnitude of change, leading to an unreliable evaluation of effects. Consequently, the impact on Tiree's landscape has been insufficiently recognised, and this underestimation undermines confidence in the assessment's conclusions.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the

potential impacts on communities that are both visually and economically connected to the seascape in question.

There remains considerable uncertainty surrounding the applicant's reliance on a distance-based methodology that applies systematic moderation and discounting of effects beyond approximately 20 kilometres. This approach inherently assumes that impacts diminish uniformly with distance, yet it fails to account for the nuanced and place-specific sensitivities of receptors located beyond this threshold. Such generalisation risks overlooking significant adverse effects that may persist or manifest differently at greater distances, thereby compromising the thoroughness of the environmental impact assessment.

Critically, as evidenced, the applicant's assessment effectively minimises the magnitude of change experienced by highly sensitive receptors beyond the 20-kilometre boundary, while neglecting to conduct any detailed place-based evaluation for the affected communities. This procedural omission undermines the integrity of the assessment process and its conclusions, leaving those communities without due consideration of the effects they endure. Consequently, the applicant's approach does not provide a robust or comprehensive appraisal of environmental impacts and should be re-examined to ensure all significant effects are properly identified and addressed.

1.1.790 Personal Observations

In addition to the planning matters above, I am personally concerned because: I visit the inner Hebrides and the coastal area of Lorne and Kintyre regularly, particularly Iona as well as having friends who run businesses there which are dependent on the tourist economy. Iona and the islands have a unique heritage and culture which has evolved in harmony with the landscape and wildlife which makes these places so special. We all understand the need for 'clean' energy. But what is being proposed can not be described as 'clean' with it's potential cost to the wildlife environment and communities who live in it. There is also a whole other argument to make for the energy and environmental cost of manufacturing these turbines and transporting them across the world. This is nothing to do with 'saving the planet' but just another 'get-even-more-rich' scheme for wealthy investors and those who will always put profit over people. There has to be better ways to move forward to a more energy efficient future.

Based on my own local knowledge, I also wish to highlight that: I am greatly concerned about the damage to the sea life in particular…including the many seabirds such as guillemots and mergansers…also the impact on what are unique landscapes which offer some of the few places of peace and tranquility left in this noisy world…please do not trash it

Finally, I would also ask the government to consider very carefully what the real legacy of this proposal of it goes ahead will be. It is absolutely crucial that they listen to the local communities and carry out rigorous independent assessments on the environmental and social impact,

1.1.791 Further Comments

It greatly saddens me that the government can even consider embracing a scheme which will degrade our Scottish countryside so significantly…it is a cynical and lazy option to buy into schemes like this which will clearly mostly be managed for the benefit of the investors and to dress them up as something good and necessary for our future wellbeing…we all know that this is a lie!! Scotland has had to contend with being sold off by a parcel o'rogues down the centuries…please do not join that company on this occasion ...and at least allow and follow proper due processes to help make the right and moral decision.

1.1.792 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant adverse impacts on nationally designated landscapes, as well as on the coastal communities and their cultural heritage. However, a more detailed examination of the applicant's published analyses reveals that these impacts have been consistently underestimated. Notably, a comprehensive heritage assessment, as required, has not been undertaken. Furthermore, while the effects on the island communities affected by the development were identified, they have not been subject to any substantive evaluation. The ecological criteria established by relevant policy have also not been demonstrated to be achievable. In addition, it is important to note that only a portion of the overall project has been submitted to the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers be inclined to grant consent, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, it is essential that the determination of these applications only proceeds following a public inquiry, which would allow for a thorough examination of the concerns raised in this objection. Regardless of the decision ultimately reached, it is further requested that the Ministers explicitly address and provide clear conclusions on the impacts upon cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 181
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), should be recorded accordingly, and I request to be notified of the final decisions.

The project envisages the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site covers a Windfarm Development Area of around 448 square kilometres of marine environment, situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities within the southern Hebrides.

The following sections articulate the grounds for objection based on planning and environmental considerations, framed within the relevant statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies with the applicant to substantiate, through robust evidence, that the statutory tests and policy requirements are met. Objectors bear no obligation to demonstrate the contrary. Having carefully reviewed the submissions and supporting documentation, I conclude that the applicant has failed to satisfy this evidential burden, and therefore, consent ought to be refused.

1.1.793 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are also required to have regard to these same statutory duties.

The evidence confirms that the application does not adequately address these requirements. There is a lack of clear demonstration that the applicant has properly considered the preservation of natural beauty or the conservation of important ecological and geological features. Similarly, the protection of heritage assets, including buildings and archaeological sites, has not been sufficiently evidenced. The application also fails to show that reasonable mitigation measures have been identified or proposed to address potential adverse effects on these protected interests.

Given these deficiencies and omissions, the application conflicts with the applicable legal and policy framework established by Schedule 9 of the Electricity Act 1989.

Where such compliance has not been demonstrated, the statutory framework dictates that these matters weigh against the granting of consent.

In conclusion, the application does not meet the statutory duties under Schedule 9 of the Electricity Act 1989, and this failure constitutes a substantive reason to refuse consent.

The marine licence application fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Authorisation decisions under this legislation must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. However, the application does not demonstrate compliance with key General Policies, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies are integral to the statutory assessment process, and the absence of demonstrated compliance undermines the lawful basis for granting consent.

Furthermore, the evidence identifies clear deficiencies and omissions in the application's adherence to the applicable legal and policy framework. Where compliance has not been demonstrated, or where conflicts with statutory requirements and National Marine Plan policies exist, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet these essential criteria means that it cannot be considered consistent with the statutory framework governing marine licensing in Scotland. Consequently, the marine licence should be refused on the grounds that the proposal does not satisfy the necessary legal and policy standards established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this development.

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters weigh decisively against the granting of consent. In this case, the proposal's failure to address these critical policy requirements undermines the statutory and policy framework intended to protect biodiversity, natural environments, historic assets, and energy considerations.

Accordingly, the application should be refused on the basis that it does not meet the mandatory standards set out in NPF4, and the identified policy breaches constitute a clear and material planning objection.

The proposal fails to provide the required comprehensive environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the development be fully identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests.

In this case, compliance with these legal obligations has not been demonstrated. The submitted evidence reveals deficiencies and omissions in the environmental impact assessment and habitats regulations assessment, resulting in a failure to meet the necessary statutory standards. Such shortcomings constitute a direct conflict with the established legal and policy framework governing environmental protection and habitat conservation.

Given these unresolved deficiencies and the absence of adequate assessment, the proposal does not satisfy the mandatory requirements of the relevant environmental legislation. Consequently, these failures weigh decisively against the granting of consent for the development.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act and reiterated in the evidence provided (S01).

The proposal does not provide adequate evidence that the interests of the relevant island communities have been properly identified, assessed, or integrated into the planning decision. There are notable deficiencies and omissions in the applicant's consideration of these interests, resulting in a failure to meet the legal and policy framework established by the Islands (Scotland) Act 2018. This failure is material and significant, as the Act explicitly requires that where compliance is not demonstrated, or where evidence reveals shortcomings, these matters must weigh against the granting of consent (S01).

In light of the absence of satisfactory evidence that the proposal has properly considered and given due weight to the interests of island communities, the application is fundamentally flawed. The decision-making process must reflect the statutory duty imposed by the Islands (Scotland) Act 2018, and the failure to do so constitutes a clear basis for refusal. Accordingly, the proposal should be refused consent on the grounds that it conflicts with the statutory requirements to consider and protect the interests of island communities.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This evidential burden is essential to ensure that every statutory duty, planning policy, and environmental assessment obligation is fully satisfied. In this case, the applicant's submissions do not provide the necessary assurance that these critical criteria have been met.

Furthermore, the evidence presented reveals clear deficiencies and omissions in addressing the applicable legal and policy framework. These shortcomings undermine confidence in the proposal's conformity with statutory and planning obligations. Where such compliance is not demonstrated, the weight of planning judgment must be directed against the granting of consent, as the statutory and policy frameworks are designed to safeguard public and environmental interests.

In conclusion, the absence of adequate evidence to prove full compliance with all legal and policy requirements constitutes a significant and determinative failing. This failure alone justifies refusal of the application, as it conflicts with the established principles that govern the planning process and the statutory duties incumbent upon the applicant. Consent should therefore be withheld.

1.1.794 Conflict with National Planning Framework 4 and the Development Plan

The proposal's compliance with NPF4 Policy 11 must be assessed in light of the policy's impact criteria, which clearly condition support for renewable energy developments upon demonstrable mitigation of adverse effects. While NPF4 Policy 11 endorses renewable energy, this endorsement is contingent upon satisfying specific impact tests, including those relating to communities (Policy 11(c)) and landscape, seascape, and other receptors (Policies 11(d) and 11(e)). In this instance, the evidence fails to demonstrate adequate mitigation measures that would address these tests. The adverse effects on nationally designated landscapes and seascapes are significant and remain insufficiently mitigated. Furthermore, the proposal does not convincingly show that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that island communities would be protected as required.

Beyond the landscape and cultural heritage concerns, the ecological considerations underpinning NPF4 Policy 11 have not been satisfactorily addressed in the submitted evidence. The policy's ecological tests require clear demonstration that potential impacts can be managed or avoided, a standard the proposal does not meet. Taken together, these shortcomings result in a fundamental conflict with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Consequently, the proposal cannot be considered compliant with the policy framework, and its approval would be inconsistent with the statutory planning objectives that seek to balance energy development with environmental and community safeguards.

The proposal fails to comply with multiple policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities; Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets; and Policy 3 on biodiversity. The submitted evidence demonstrates that the proposal would result in significant adverse impacts on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the ecological

assessments required under Policy 3 have not been satisfactorily met. Taken together, these failures establish clear conflicts with the relevant NPF4 policies intended to safeguard designated assets.

The applicant's evidence acknowledges that, in relation to terrestrial impacts, the proposal conflicts with the Argyll and Bute Local Development Plan 2. It is recognised that the development would adversely affect the landscape character, heritage assets, and community interests that the Plan seeks to safeguard. These identified adverse effects highlight a clear inconsistency with the objectives and protections established within the local development plan framework.

This conflict extends beyond the local level to encompass the wider spatial planning context, as the proposal also fails to align with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be mitigated or overridden. Consequently, the proposal remains at odds with the relevant terrestrial development plan policies and the national planning framework, undermining its conformity and acceptability.

1.1.795 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease. Nevertheless, analysis of the applicant's Chapter 16 and Appendices 16.1 to 16.3 reveals a clear pattern: no highly sensitive receptor situated more than approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This indicates a de facto limitation embedded within the assessment, constraining the recognition of significant impacts to receptors within this 20-kilometre radius.

Further scrutiny of the applicant's own documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area located over 30 kilometres from the development is judged to experience only a small scale of change due to viewing distance. Similarly, the Landscape Character synthesis categorises impact magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude precisely at distances where the most sensitive designated landscapes are found results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

The applicant's evidence draws on NatureScot's visualisation guidance, which recognises inherent limitations in the use of printed visual materials to represent proposed developments. Specifically, it is acknowledged that such visualisations cannot fully replicate the scale as perceived by a viewer on site. This fundamental constraint affects the reliability of visual assessments that depend on photographic panoramas.

Furthermore, wireline drawings incorporated within these panoramic projections carry similar limitations. As noted, they are technical renderings integrated within the visualisation process rather than independent tools that might correct or enhance the photographic images. This means they do not provide an objective or definitive measure of visual impact but rather serve as an adjunct to the photographic evidence.

Taken together, these points suggest that visualisation materials, while useful, have technical and perceptual shortcomings that should be carefully considered in the assessment process. The reliance on such materials must be balanced with an understanding of their constraints to ensure that conclusions drawn about visual effects are appropriately qualified.

While mitigation measures might be considered to address lighting impacts, it is important to recognise that the introduction of aviation and navigation lighting will inevitably and permanently alter the character of the night-time seascape. Currently, the sea horizon in question remains unlit, and the proposed development would introduce such lighting for the full 35-year operational lifespan of the wind farm. This change is not merely a temporary inconvenience; rather, it represents a fundamental transformation of the seascape's visual qualities during nighttime hours. Moreover, this operational timeframe does not limit the policy harm. Granting consent for this development effectively signals that the seascape is deemed appropriate for wind farm use despite the significant and enduring alteration to its night-time character. Consequently, the impact on seascape character and the associated lighting effects warrant careful consideration in light of relevant planning policies before any approval is granted.

There remains significant uncertainty regarding the proposal's compliance with key policies designed to safeguard landscape and seascape interests. Although certain effects have been acknowledged, the applicant has failed to demonstrate that its conclusions on the scale of these effects align with its own established methodology. This lack of clarity undermines confidence in the assessment's reliability and the overall robustness of the supporting evidence.

Furthermore, the proposal does not adequately comply with the relevant provisions of NPF4, specifically Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively protect nationally important landscapes and seascapes, yet the applicant has not shown that the proposal meets these requirements. In light of this non-compliance, the proposal should be refused.

1.1.796 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, leading to significant doubts about the reliability of its conclusions concerning the setting of historic assets. By not properly evaluating whether changes to setting affect the contribution setting makes to cultural significance, the assessment undermines confidence in its findings. This methodological shortfall is critical because it impedes a proper understanding of whether the integrity of setting is adequately retained, a fundamental consideration in assessing heritage impacts.

Historic Environment Scotland's recognised methodology, which the applicant claims to have adopted, explicitly requires an evaluation that goes beyond the mere description of visual changes. While the methodology involves consideration of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it clearly states that visual change alone should not be equated directly with adverse impact. The assessment, however, focuses primarily on these visual factors without demonstrating the essential evaluative step of assessing setting integrity, as prescribed by the methodology.

A Methodological Audit, prepared in support of community objections and based entirely on the applicant's own Appendix 14.3, confirms these concerns. It highlights that although the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been assessed in line with the accepted methodology. The audit notes that this evaluative stage is missing in all the worked examples examined. Consequently, the assessment's conclusion that the integrity of setting is adequately retained lacks the necessary methodological foundation, calling into question the validity of its heritage impact conclusions.

The practical consequence of relying solely on fixed viewpoints to assess heritage impacts is a significant underrepresentation of the cultural significance of the affected assets. The applicant's baseline acknowledges that this significance arises from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape, where the interrelationships between monuments, spirituality, and the surrounding landscape and seascape are essential. These attributes are inherently dynamic and cannot be fully appreciated from static observation points.

Historic Environment Scotland's consultation responses, as recorded within the application documents, underscore this concern by requesting additional viewpoints to capture the broader cultural landscape comprehensively. This request highlights the necessity of a more nuanced assessment approach that embraces the experiential nature of the heritage assets, ensuring that the full range of their values is properly represented in the evaluation process.

Consequently, the assessment as submitted does not adequately reflect the baseline qualities or the cultural significance of the heritage assets as experienced in situ. To address this deficiency, it is imperative that a more holistic methodology be employed, incorporating movement and spatial relationships to avoid overlooking key experiential aspects that contribute materially to the heritage value. Without this, the appraisal risks undervaluing the assets and overlooking potential adverse impacts.

The heritage impact conclusions presented rely heavily on the findings of the landscape assessment, making it essential that the latter is robust and comprehensive. However, where the landscape effects have been understated, as previously detailed, this inevitably leads to a corresponding understatement in the heritage conclusions that depend upon them. This reliance creates a critical vulnerability in the overall assessment, as any deficiencies in the landscape evaluation directly diminish the credibility of the heritage impact analysis.

In comparing the approach taken to mitigation, it becomes clear that effective and accurate landscape assessment is fundamental to informing appropriate heritage protection measures. If the landscape effects are downplayed, the subsequent heritage conclusions may fail to fully recognise the true extent of potential harm. This could result in mitigation strategies that are insufficiently rigorous or targeted, thereby compromising the preservation of valued heritage assets. The interdependence of these assessments necessitates a consistent and thorough approach to landscape evaluation to ensure that heritage impacts are neither overlooked nor minimized.

Therefore, it is crucial that the landscape assessment be revisited and strengthened to provide a more accurate and complete picture of the effects. Only with a reliable landscape baseline can heritage impacts be properly understood and addressed. Without rectifying these deficiencies, the heritage conclusions remain undermined, and the planning decisions based upon them risk inadequately safeguarding the historic environment.

The practical consequence of the application's failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.797 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities, which depend to an exceptional degree on visitors. These visitors are attracted by precisely those qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—that the applicant's own baseline assessments identify. Any changes to these qualities would undermine the

economic base of these communities, with consequential impacts on local services, population stability, and their long-term viability.

The applicant's failure to assess the habitability of the affected islands means the socio-economic impacts on island communities have not been properly understood or mitigated. Although their own consultants recognised habitability as a potentially significant pathway for effect, no place-based analysis was conducted for these communities. Instead, the assessment in Chapter 18 focuses on regional-level analysis, detailing port communities while neglecting the island populations directly facing the development. Despite this omission, the report concludes that island communities exhibit low sensitivity to tourism impacts. This conclusion is fundamentally flawed. Small island economies differ markedly from regional averages, being heavily reliant on sectors vulnerable to changes in visitor-attracting qualities. Far from reducing sensitivity, dependence on increasing visitor numbers intensifies vulnerability to any degradation of those qualities. Therefore, the assertion of low sensitivity, reached without specific place-based evidence, cannot be accepted as sound assessment but must be regarded as an unfounded assumption.

There remains significant uncertainty as to whether the proposal complies with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan mandate that decisions be based on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process. However, the applicant has acknowledged the need for particular scrutiny of island communities yet failed to conduct the necessary assessment to understand the potential impacts on them. Consequently, there is no demonstrated compatibility with the principles of sustainable island communities, and the statutory duties owed to these communities have not been satisfactorily discharged. In light of these shortcomings, the proposal does not meet the required planning and statutory standards, and therefore cannot be supported.

1.1.798 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the full extent of ecological impacts arising from the proposed development within this sensitive marine environment. The area in question encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological importance. Moreover, the surrounding waters provide habitat for a range of protected species including seabirds, marine mammals and basking sharks.

The scale of the proposal is significant, with construction, operation and eventual decommissioning activities projected to take place over several decades. Introducing such sustained and large-scale human activity into an environment of high ecological sensitivity raises concerns about potential adverse effects, which have yet to be satisfactorily addressed. The cumulative and long-term consequences on the integrity of the Priority Marine Features and associated species warrant thorough scrutiny.

Given the recognised environmental value of the site and the scale of the proposed works, careful consideration must be given to the potential for significant harm. It is essential that any planning decision fully accounts for the ecological sensitivities and ensures that adequate measures are in place to avoid or mitigate adverse impacts throughout the lifetime of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where the possibility of an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application is therefore a noteworthy aspect, as it indicates the applicant's acknowledgment of potential impacts. Moreover, the applicant's own position implies that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. In light of this, the submission of these derogation and compensation documents reflects a recognition of the need to address and mitigate possible harm to protected species and sites under the relevant statutory provisions.

In considering developments affecting protected habitats, it is important to recognise that mitigation measures, compensation proposals, and future monitoring alone are insufficient to satisfy the legal requirements under the Habitats Regulations. While such measures may form part of the overall assessment, they do not in themselves eliminate reasonable scientific doubt regarding potential adverse effects on site integrity. Consequently, consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site or where the strict derogation tests have been met.

This stringent evidential standard places the burden of proof squarely on the applicant, who must provide clear and convincing evidence that the statutory tests are satisfied. The legal framework governing this process is supported by several policy instruments, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively reinforce the imperative to protect designated habitats and species by ensuring that development consent is not granted unless the highest standards of environmental protection are demonstrably upheld.

Accordingly, the decision-making process must be rigorous and precautionary, reflecting the high threshold established by law and policy. It is therefore essential that proposals are accompanied by robust, scientifically sound evidence that fully addresses potential impacts, rather than relying primarily on mitigation or compensatory measures. Only by meeting this exacting standard can the integrity of protected sites be safeguarded in accordance with the Habitats Regulations and relevant planning policies.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant's own derogation documents, which collectively reveal an absence of the requisite certainty regarding

compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.799 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

The failure to adequately address project splitting and cumulative effects in the current proposal poses a significant risk to the integrity of the environmental assessment and subsequent planning decisions. Without a reliable identification and assessment of the cumulative and in-combination effects, as well as the overall impact of the project including deferred works, there is a practical danger that adverse environmental consequences may be overlooked. This omission undermines the robustness of the decision-making process and could lead to approval of development that does not fully comply with established policy and regulatory frameworks.

The applicant's submission does not satisfy the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it comply with NPF4 Policy 11(e). Furthermore, it fails to meet the standards mandated by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. These policies and regulations exist to ensure that all elements of a development are considered collectively, thereby providing a comprehensive understanding of the potential environmental effects. The absence of such an approach here means that the cumulative impacts, including those arising from deferred components of the project, remain unquantified and unmitigated.

In light of these concerns, it is imperative that the planning authority requires explicit consideration of the deferred works as part of the overall project assessment before any determination is made. This will ensure compliance with the relevant policy and regulatory requirements and promote a thorough and transparent evaluation of all potential effects. Only through such rigorous scrutiny can the planning process uphold environmental protection standards and deliver sustainable outcomes.

1.1.800 Public Engagement, Site Selection and Environmental Information

The consultation process surrounding this application has resulted in a practical consequence that undermines the legitimacy of the site-selection exercise itself. The applicant requests that Scottish Ministers accord significant weight to the site-selection process; however, the quality of public participation during both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The sheer volume of technical documentation, spanning many thousands of pages, presents an unreasonable burden on affected communities. Moreover, the consultation period coincided with the busiest months of the year for island residents, who are engaged intensively throughout the visitor season and have limited access to specialist advice during this time. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, creating an imbalance that disadvantages public contributors.

This imbalance directly conflicts with the standards of effective public participation enshrined in GEN 18 of the National Marine Plan and the principles embodied in the Aarhus Convention. These frameworks require that individuals and communities affected by decisions of this magnitude have a realistic and meaningful opportunity to engage in the process. The conditions under which the island communities have been expected to respond fall short of this required standard. Consequently, the consultation cannot be regarded as genuinely inclusive or adequate in facilitating informed public input. This failure to meet established participation principles diminishes the credibility and transparency of the decision-making process.

Accordingly, it is imperative that Scottish Ministers give careful consideration to these representational concerns when weighing the merits of the application. The deficiencies in public engagement not only diminish trust in the process but also raise serious questions about whether the application has been subject to sufficient scrutiny by those most directly affected. Upholding the standards of effective and equitable public participation is essential to ensuring that any decision taken is both legitimate and justifiable.

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application's dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.801 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's assessment underestimates the significant impact that the proposed development would have on the island of Iona, leading to an incomplete evaluation of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would dominate around 39 degrees of the horizon, affecting key areas such as the ferry crossing between Fionnphort and Iona. This scale of visual intrusion is substantial, particularly when compared to familiar landmarks; for example, the tallest turbines would exceed the height of Ben Hynish on Tiree by about 194 metres, despite being viewed at a closer distance of roughly two-thirds.

Furthermore, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant accepts that there would be significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. Importantly, the island's internationally significant monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage and movement through the seascape. Historic Environment Scotland requested additional visual viewpoints from critical locations such as the ferry crossing, yet the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving gaps in understanding the full heritage impact.

Equally concerning is the social impact on the island community, which has not been thoroughly assessed. A household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, reflecting widespread local objection. Although the applicant's own consultants identified habitability as a potential pathway of effect on the community, this aspect was never properly evaluated. This omission undermines the reliability of the applicant's social impact appraisal and fails to address the lived experience of Iona's residents. Taken together, these factors demonstrate that the applicant's environmental and social impact evaluation for Iona is incomplete and underestimates the true scale and significance of the effects.

While the applicant acknowledges significant effects on certain areas and communities within Mull and Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort—the latter being a critical gateway for visitors to Iona—their assessment relies heavily on distance-based mitigation assumptions that warrant closer scrutiny. For example, the Ross of Mull South coastal area is rightly identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed as Medium magnitude. However, the applicant's acceptance of significant effects in these zones contrasts with the treatment of more distant areas such as the Wilderness and Gribun Rocks coastal area, where, despite the High sensitivity classification of the Loch na Keal National Scenic Area (spanning 21 to 33 kilometres), the magnitude of effect is judged to be no more than Medium. This approach underplays the cumulative and perceptual impacts on the wider landscape.

Moreover, the applicant's assessment omits place-based analysis for communities that rely heavily on the unspoiled Atlantic seascape, including those dependent on the west-facing tourism economy, wildlife boat operations, and accommodation services in the western townships of Mull. The proposed development's

industrialisation of this seascape threatens to undermine the natural qualities upon which these communities depend, yet they are not explicitly evaluated within the assessment. The reliance on viewing distance as a primary determinant of impact magnitude fails to capture the nuanced economic and social dependencies tied to these landscapes and seascapes.

In conclusion, while some mitigation is acknowledged by the applicant, the assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent communities. The approach, focused on distance-based reasoning, does not sufficiently reflect the sensitivities or the interlinked nature of these coastal environments and their associated human activities.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment concludes that the South Tiree coastal area, despite being approximately 35 kilometres away, experiences only a Low magnitude of change, even though it is acknowledged as having High sensitivity. This practical consequence is significant because it suggests that the visual and landscape impacts on Tiree's sensitive environment are minimal, which risks underestimating the true extent of change that the proposed development would cause. Such an understatement could lead to insufficient mitigation measures and a failure to fully protect the island's distinctive character.

Tiree's landscape is exceptionally low-lying and defined by the interplay of sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The introduction of turbines up to 335 metres tall would create vertical elements unprecedented in the island's open seascape, fundamentally altering the horizon that is central to its character. Given this context, assigning a Low magnitude of change to such a sensitive receptor is inconsistent with the physical reality and landscape experience, leading to an unreliable evaluation of effects that should be revisited to accurately reflect the scale of visual intrusion.

The applicant's assessment has not adequately addressed the significant effects of the proposed development on mainland and island communities with direct visual and economic connections to the seascape. For example, Gigha—a community-owned island celebrated as a national emblem of island regeneration—faces the development waters from the east. The potential impacts on its carefully balanced community and economy remain unexamined, representing a notable omission in the applicant's evaluation. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the types of receptors for which the applicant's distance-based moderation approach is applied, raising concerns about the adequacy of the assessment in capturing their significance.

Further, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands, alongside mainland coasts with views of the development area, share this position of reliance on the seascape. Despite this, the applicant's assessment appears to have overlooked these receptors, undermining the comprehensiveness of the environmental and socio-economic evaluation. Such gaps in the analysis risk compromising the robustness of the decision-making process and warrant thorough reconsideration to ensure that all affected communities are properly accounted for.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of the true impacts experienced by these receptors, as the assessment consistently moderates effects based solely on distance rather than on site-specific sensitivity or context.

This method fails to provide any place-based assessment for the communities living beyond this 20-kilometre threshold, despite the fact that these communities are demonstrably affected. By applying a blanket discounting of effects at this distance, the assessment overlooks meaningful environmental and social consequences, thereby undermining the integrity and comprehensiveness of the environmental evaluation process.

In conclusion, the reliance on a distance-based moderation and discounting framework leads to a significant gap in the assessment's scope and accuracy. To ensure a robust and credible environmental impact assessment, it is essential that

effects on sensitive receptors beyond 20 kilometres are fully recognised and appropriately evaluated, rather than systematically diminished or ignored.

1.1.802 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am Scottish. Our land should not be destroyed by and for corporate greed. This beautiful area with its communities and wildlife are so important to our history, our futures and to the planet

Based on my own local knowledge, I also wish to highlight that: Everything about the area, just leave it alone!!

Finally, I would also ask the Scottish Ministers to consider: Everything contained in this petition. Do not destroy our land

1.1.803 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, a detailed review of the applicant's submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted. Moreover, although the effects on the island communities involved were identified, these impacts have never undergone proper evaluation. The ecological assessments, which are essential to meet statutory tests, have not been demonstrated to be capable of compliance. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow the substantive issues raised in this objection to be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address and state their conclusions on the effects of the proposal on cultural heritage and the island communities within their decision rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 182
Dear Sir/Madam,

I formally register my objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for a large-scale offshore wind development.

The project entails the installation of an offshore wind farm with a capacity of approximately 2 gigawatts, incorporating between 91 and 144 turbines. Each turbine would reach a maximum blade tip height of up to 335 metres. The development is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of maritime area located north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from Iona, placing it in proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing these applications. It is essential to emphasise that the responsibility to prove compliance with these tests rests entirely with the applicant. Objectors, including myself, are not obliged to demonstrate contrary evidence. Upon examination of the material submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent ought to be refused. I request that this correspondence be treated as a formal objection, that I be recorded as an objector, and that I receive notification of the decision concerning these applications.

1.1.804 Legislative and Policy Framework

The marine licence application currently under consideration raises significant uncertainty regarding its compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Under the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless other relevant considerations indicate otherwise. This statutory framework imposes a clear obligation on the determining authority to ensure that all applications demonstrate full compliance with the applicable policies before consent can be granted.

In this case, the application must be assessed against a suite of General Policies within the National Marine Plan that are particularly pertinent to the proposal. These include GEN 4, which addresses Co-existence; GEN 6 and paragraphs 4.22 to 4.23, which relate to the Historic Environment; GEN 7 and paragraph 4.28, concerning Landscape and National Scenic Areas; GEN 9, which covers Natural Heritage; GEN 13 and GEN 18, which focus on Engagement; GEN 19 and paragraph 4.81, which require Sound Evidence; and GEN 21 and paragraph 4.85, which deal with Cumulative Impacts. Each of these policies forms an integral part of the statutory assessment framework and must be demonstrably satisfied by the applicant.

However, the evidence before the determining authority does not establish that compliance with these policies has been achieved. There are identifiable deficiencies and omissions within the application that undermine its conformity with the legal and policy framework. The absence of clear demonstration of adherence to these policies introduces material uncertainty as to whether the proposal can lawfully proceed. In particular, the failure to provide sound evidence as required by GEN 19, and the lack of adequate consideration of cumulative impacts under GEN 21, are critical shortcomings that weigh heavily against the granting of consent.

Given these unresolved uncertainties and the statutory requirement that authorisation decisions align with the National Marine Plan, the application cannot be considered compliant with the Marine (Scotland) Act 2010 and its associated policies. Consequently, these deficiencies and conflicts with the statutory framework must be regarded as substantive grounds for refusal of the marine licence.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the evidence submitted does not adequately demonstrate how this proposal will achieve such outcomes. Similarly, under Policy 4, the proposal must safeguard natural places, but the application lacks sufficient detail or measures to ensure the protection of these environments. Policy 7 mandates the conservation and enhancement of historic assets and places; however, the proposal fails to provide convincing evidence that these heritage considerations have been properly addressed or that any adverse impacts will be avoided or mitigated. Finally, Policy 11 on Energy requires that developments contribute positively to energy objectives, but the application does not satisfactorily show compliance with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of demonstrated conformity with these critical NPF4 policies, the proposal should be refused planning permission.

The proposal fails to provide the comprehensive environmental impact assessment required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any determination. This omission undermines the statutory process designed to ensure informed decision-making and environmental protection.

Furthermore, the application does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the proposal’s effects on European protected sites in accordance with the applicable statutory tests. The

absence of such an assessment constitutes a clear failure to meet legal obligations intended to safeguard protected habitats and species.

Given these deficiencies and the failure to demonstrate compliance with both the environmental impact assessment and habitats regulations, the proposal conflicts with the applicable legal and policy framework. As established, where such compliance is not shown, these matters weigh decisively against the granting of consent. Therefore, the application should be refused on these grounds.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is not a discretionary matter but a clear legal requirement, and the absence of any substantive evidence showing that these interests have been properly assessed or integrated into the planning decision framework constitutes a fundamental procedural deficiency. Unlike scenarios where mitigation measures or compensatory provisions might offset adverse impacts, no such measures have been presented or evidenced here to address the statutory duty under the Act. Consequently, the proposal stands in stark contrast to the legislative intent and fails to meet the threshold of lawful and policy-compliant decision-making.

Furthermore, the lack of demonstrated compliance with the Islands (Scotland) Act 2018, coupled with the evident omissions and deficiencies in addressing the interests of island communities, directly conflicts with the applicable legal and policy framework. As established by the approved evidence, where such compliance is not shown, these failures must weigh decisively against the granting of consent. The proposal’s disregard for this statutory requirement undermines the integrity of the planning process and the protection afforded to island communities by the Act. In the absence of any evidence to the contrary, the proposal cannot be considered lawful or appropriate, and the planning authority is compelled to refuse consent on this basis alone.

The application fails to dispel fundamental uncertainty regarding compliance with the full spectrum of statutory duties, planning policies, and environmental assessment requirements. The applicant has not provided robust, objective, and proportionate evidence to demonstrate that every relevant legal and policy obligation has been met, leaving critical gaps in the evidential record.

Given these unresolved deficiencies and omissions, the application does not satisfy the evidential burden incumbent upon the applicant. In accordance with established principles, such failures weigh decisively against the granting of consent. The absence of demonstrated compliance with all applicable frameworks mandates refusal.

1.1.805 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, such support is contingent upon satisfying the impact criteria set forth within the policy itself. These include, notably, Policy 11(c), which addresses impacts on communities, alongside Policies 11(d) and 11(e), which pertain to impacts on

landscape, seascape, and other receptors. The policy framework thus requires that any proposed development must demonstrate compliance with these criteria to secure its legitimacy under NPF4.

In this case, the proposal fails to meet these essential requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the integrity of these protected areas. Furthermore, there is no convincing evidence that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded from detrimental impacts. Additionally, the ecological assessments submitted do not demonstrate that the necessary environmental tests can be satisfied. Taken together, these shortcomings establish a clear conflict with the impact criteria of NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy in this instance.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 is to be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7, including section 7(h) on scheduled monuments and 7(c) and 7(d) concerning the setting of historic assets, alongside Policy 3 on biodiversity, establishes a comprehensive framework for the protection of these critical assets.

An analysis of the proposal against these policies reveals clear conflicts. The development would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the reasons for their designation. Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. It also fails to show adequate safeguards for island communities. Lastly, the ecological tests required by Policy 3 have not been evidenced as capable of being met. Taken together, these deficiencies indicate that the proposal is inconsistent with key NPF4 policies protecting designated assets and therefore cannot be supported.

The proposal would result in adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. This direct conflict with the policies designed to protect these aspects demonstrates that the development is inconsistent with the relevant land-based planning framework. In addition, the proposal fails to align with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to overcome these conflicts or to justify departure from the established policy protections. In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework and national planning policies, and therefore cannot be supported.

1.1.806 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to establish a clear distance threshold beyond which major effects cease, undermining the reliability of its predicted impacts. Although Appendix 16.1 does not specify such a threshold, independent

analysis of the applicant's Chapter 16 and related appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This implicit distance-based limitation is further evidenced by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is considered small due to viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes effectively understates the inputs to the protective tests. Consequently, the conclusions drawn from this methodology cannot be regarded as a reliable description of the effects that Scottish Ministers are being asked to consent.

When comparing the proposed mitigation measures, it is important to recognise that the visualisation materials submitted in support of the assessment possess inherent limitations that affect their reliability as a tool for fully understanding visual impacts. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This fundamental shortcoming means that any mitigation strategies evaluated primarily through such visualisations may not reflect the actual visual experience on site.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. They serve as a technical rendering within the overall visualisation package rather than functioning as an independent means to correct or enhance visual accuracy. Consequently, reliance on these materials without acknowledging their technical and perceptual limitations risks underestimating or misrepresenting the visual effects of the development. This calls for caution in drawing firm conclusions from the visual evidence as currently presented.

The introduction of aviation and navigation lighting to an otherwise unlit sea horizon will permanently alter the character of the night-time seascape for the full 35-year operational period of the development. This change is not merely a temporary inconvenience; it represents a fundamental and lasting transformation of the visual environment. Moreover, from a policy perspective, granting consent for this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent for future decisions. Such implications must be carefully weighed in considering the acceptability of the proposal.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in unacceptable adverse effects. Specifically, these impacts engage National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as Policy GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not adequately demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. Consequently, the proposal does not satisfy the requirements of the relevant policies intended to protect the integrity of nationally

significant landscapes and seascapes. Therefore, it should be considered non-compliant with the established policy framework.

1.1.807 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's established methodology for evaluating effects on the setting of historic assets, which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant's Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant's conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, the relationships between monuments, spirituality, and the encompassing landscape and seascape, which are experienced dynamically rather than from fixed viewpoints. However, Historic Environment Scotland's consultation responses, as recorded within the application, highlight the need for additional viewpoints to adequately capture and represent these broader experiential and cultural landscape qualities. This indicates that the current assessment may not fully encompass the intangible and movement-based aspects integral to the heritage assets' significance, thereby necessitating a more comprehensive approach to ensure that the full cultural context is properly considered in the impact evaluation.

The heritage impact conclusions presented in the proposal are closely linked to the findings of the accompanying landscape assessment. It is important to consider that any mitigation measures proposed rely fundamentally on the accuracy and comprehensiveness of the landscape evaluation. When landscape effects are minimised or understated, as has been identified, the proposed mitigation may not adequately address the full scope of potential harm.

This reliance raises significant concerns because the heritage conclusions effectively inherit the deficiencies present in the landscape assessment. If the latter underestimates the visual or environmental impacts, the resulting heritage assessment will similarly understate the potential adverse effects on historic assets.

This interconnectedness means that any shortcomings in landscape evaluation directly undermine the credibility of the heritage impact findings.

Accordingly, the robustness of the overall assessment is compromised by this dependence. Without a fully accurate and transparent landscape analysis, the conclusions regarding heritage impacts cannot be regarded as reliable. It follows that the planning authority should carefully scrutinise these linked assessments to ensure that any mitigation measures are grounded in a comprehensive understanding of the true effects.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.808 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address some impacts of the development, they are insufficient when weighed against the fundamental reliance of the island communities on the very qualities the proposal threatens. The applicant's own baseline assessments confirm that visitors are drawn to these islands specifically for their landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the cornerstone of the local economy, underpinning visitor expenditure that sustains essential services and supports population retention. Any alteration to these defining characteristics would therefore directly undermine the economic viability of these communities and jeopardise their long-term social sustainability.

The applicant's own consultants have acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses potential impacts at a regional scale, focusing in detail on port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment asserts that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies differ markedly from regional averages. Their economic structures are concentrated in sectors most vulnerable to alterations in the qualities attracting visitors, and their reliance on increasing visitor numbers amplifies, rather than diminishes, their sensitivity to such

changes. Therefore, the conclusion of low sensitivity for these island communities, reached without any place-specific analysis, lacks evidential basis and amounts to an unfounded assumption rather than a substantiated finding.

There remains significant uncertainty regarding the proposal's compliance with the statutory and policy requirements designed to protect island communities. The National Marine Plan, specifically GEN 19 and paragraph 4.81, alongside NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, establish a clear expectation that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. These provisions explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process. The absence of sound socio-economic data and the lack of a precautionary approach call into question the reliability of the proposal's assessment in this regard.

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.809 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over several decades. This large-scale intervention risks causing significant adverse effects due to the disturbance and potential damage to Priority Marine Features and Annex I habitats situated within the development area itself.

Moreover, the surrounding waters serve as important habitats for various protected species, including seabirds, marine mammals, and basking sharks. The presence of these species underscores the ecological value and vulnerability of the site, necessitating careful consideration of any impact arising from the project.

Given the established ecological importance and sensitivity of the location, it is imperative that any proposals fully account for the potential environmental consequences. Adequate safeguards and mitigation measures must be incorporated to prevent unacceptable harm to these priority habitats and protected species throughout the lifespan of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The inclusion of

these documents is a notable aspect of the application, as it acknowledges the potential for harm to the designated habitat. Furthermore, the applicant's own approach indicates that the Scottish Ministers may reach a different conclusion regarding adverse effects, underscoring the importance of these submissions in the overall assessment process. The preparation and presentation of these derogation and compensation documents demonstrate a recognition by the applicant of the environmental sensitivities involved and an intention to address potential impacts in accordance with statutory provisions.

The legal framework governing developments affecting protected habitats is unequivocal in its requirements. Under the Habitats Regulations, consent for such developments may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are met. Importantly, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The responsibility to demonstrate this rests squarely with the applicant, who must provide clear and robust evidence to satisfy the statutory requirements. Mitigation, compensation measures, and future monitoring, while relevant, do not in themselves suffice to meet these stringent tests.

This legal obligation is further reinforced by policy provisions within the National Marine Plan and NPF4. Specifically, policies GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4, collectively establish a comprehensive policy framework that complements and supports the Habitats Regulations. These policies underscore the need for rigorous assessment and a high evidential standard when considering developments potentially impacting protected habitats and species, thereby ensuring ecological integrity is maintained.

Given this context, it is essential that any planning decision adheres strictly to these legal and policy requirements. The applicant must convincingly demonstrate beyond reasonable scientific doubt that the proposed development will not adversely affect the protected site's integrity. Without such evidence, consent cannot be lawfully granted. This approach safeguards the protected habitats and species, aligning with both statutory obligations and national planning policies.

The applicant's submission fails to demonstrate compliance with the statutory tests intended to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the legal requirements can be met, which is critical when considering the potential impacts on such ecological features.

Given this insufficiency, the case for granting consent is fundamentally undermined. Without clear assurance that the statutory protections will be satisfied, the proposal cannot be deemed legally compliant or environmentally responsible. Consequently, the application should not be approved in its current form.

1.1.810 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it considers only part of the project before the Scottish Ministers, deferring critical components such as the

export cable corridor and onshore transmission works to later applications. These deferred elements are essential for the wind farm's operation, yet their effects are never evaluated collectively with the principal development. This fragmented process prevents a comprehensive assessment of the project's cumulative impacts and contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than divided into smaller parts whose individual effects appear diminished. Such an incomplete evaluation undermines proper decision-making and fails to meet procedural and legal standards.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. As established, the baseline evaluations concerning landscape, heritage, and socio-economic factors have been shown to understate the actual effects. Consequently, the cumulative assessment is predicated on this diminished baseline, which inherently weakens the accuracy of its conclusions.

Given that the baseline conditions themselves are underestimated, the resulting cumulative assessment inevitably undervalues the combined effects arising from this proposal alongside existing, consented, and foreseeable developments. This flawed foundation renders the cumulative impact assessment unreliable and fails to capture the true scale of potential harm. Therefore, the assessment cannot be considered a sound basis for decision-making in this context.

There remains significant uncertainty regarding the applicant's compliance with key policy and regulatory requirements relating to project splitting and the assessment of cumulative effects. In particular, the proposal fails to demonstrate that the cumulative and in-combination impacts have been thoroughly identified and evaluated, as required by GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed within the application, leaving a gap in the understanding of the full scope and consequences of the project. It is therefore essential that the decision-making process explicitly considers these outstanding matters to ensure that all environmental effects are comprehensively assessed and that the proposal aligns with the statutory and policy framework before any determination is made.

1.1.811 Public Engagement, Site Selection and Environmental Information

The deficiencies in public participation and the timing of consultations have significantly undermined the legitimacy of the site-selection process, with practical consequences for the weight that the Scottish Ministers may reasonably place on it. The applicant requests substantial deference to the site-selection process; however, the quality of public engagement at both the plan and site-selection stages has been inadequate and this shortfall has persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied with continuous work throughout the visitor season and when access to specialist advice is most limited. Meanwhile, the applicant has benefited from years of preparation supported by considerable professional and financial resources.

The National Marine Plan's Policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected must have a realistic and meaningful opportunity to engage in decisions of this scale. The conditions under which the affected communities were expected to respond plainly fall short of these standards. Consequently, it is imperative that the Scottish Ministers take these deficiencies into account when assessing the representations made, recognising the compromised nature of public participation in this process.

The practical consequence of the current Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make an informed decision on the application due to insufficient environmental information. The EIA is the principal evidential basis for determination, and the critical issue is not the extent of the assessment but its adequacy. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Furthermore, the application relies in certain instances on future assessments, post-consent plans, monitoring, and additional approvals to address environmental effects. However, these measures do not negate the requirement under the EIA Regulations that likely significant effects must be fully understood prior to determination. The regulatory framework clearly mandates that the environmental impacts should be adequately assessed and made available at the time of decision-making, rather than deferred to later stages of the process.

In conclusion, the Scottish Ministers are obliged to determine the application based on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted satisfies this requirement. Without sufficient and robust environmental data, any determination risks being made on an incomplete understanding of likely significant effects, which undermines the statutory purpose of the EIA and the integrity of the decision-making process.

1.1.812 Effects on Local Area

The applicant's environmental and heritage impact assessment fails to adequately mitigate or even fully recognise the significant effects on the island communities of Islay, Colonsay, and Oronsay, particularly when compared to the scale and proximity of the proposed development. Although mitigation measures are outlined for certain ecological features, such as the seabird populations of the North Colonsay and Western Cliffs Special Protection Area, these do not extend to a comprehensive evaluation of the broader socio-economic and cultural impacts on these islands. The development area, encompassing 448 square kilometres, lies immediately north-west of Islay and west of Colonsay, yet the application primarily considers Islay as a potential project site rather than as a discrete community facing the nearest edge of the development. This approach neglects the place-based assessment necessary to understand the development's direct effects on Islay's Atlantic-facing communities,

their economy, and their way of life. Consequently, the application's mitigation strategy is limited and does not address the full extent of potential harm.

Moreover, for Colonsay and Oronsay, the application acknowledges the presence of internationally protected seabird populations and proposes derogation and compensation plans related to the adjacent Special Protection Area. However, the assessment inadequately addresses the broader implications for the islands' seaward outlook, which is integral to daily life and community identity. Of particular concern is Oronsay Priory, a scheduled monument of national importance, situated within the affected community area. The heritage assessment's shortcomings, especially regarding the preservation of the monument's open maritime setting, remain unaddressed, undermining the reliability of the impact evaluation. Taken together, these deficiencies reveal a fundamental underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, which calls into question the robustness and completeness of the applicant's environmental and heritage impact appraisal.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on the community and environment of Iona, leading to an incomplete and inaccurate evaluation of its effects. This shortfall has practical consequences for the island's residents and visitors, as the assessment fails to fully address the potential loss of habitability identified by the applicant's own consultants. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet despite this clear community concern, the pathway of potential effect on habitability remains unassessed.

The visual and heritage impacts are particularly significant given Iona's unique and highly sensitive landscape. The Coastal Character assessment attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of about 21 kilometres, affecting views from key locations such as the ferry crossing between Fionnphort and Iona. The west coast of Iona is similarly assessed as highly sensitive, with widespread visibility and accepted significant effects for residents and visitors throughout much of the island, including from Dùn Ì, its highest point.

Moreover, Iona's monastic landscape, which includes internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional visualisations from critical viewpoints, including the ferry crossing itself, yet crucial views from raised ground above St Columba's Bay at Càrn Cùl ri Èirinn remain unprovided. To illustrate the scale of the impact, the largest turbines would overtop Ben Hynish on Tiree—an established landmark visible from Iona at 33 kilometres—by approximately 194 metres, despite being located at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment does not adequately capture the magnitude or significance of the development's effects on Iona's visual environment, community wellbeing, or heritage value.

The applicant's assessment of the proposed development significantly underestimates the practical consequences for the coastal communities and landscapes of Mull and the Ross of Mull, particularly in relation to their tourism economies and designated scenic areas. For example, Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors, is recognised by the applicant as experiencing significant effects. This community is directly dependent on visitor flows, yet no comprehensive, place-based assessment has been provided to address the impact on its social and economic wellbeing. Similarly, the Core Paths of the Ross of Mull and areas such as Erraid are acknowledged to be significantly affected, yet these impacts are not fully accounted for in terms of their implications for local residents and visitors alike.

Across Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres. Despite this, the magnitude of impact is only rated as Medium, a conclusion that appears inconsistent with the recognised importance of this landscape. The applicant's reliance on distance-based criteria to diminish the perceived scale of change, as seen in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further exemplifies the inadequacy of the assessment. This approach fails to capture the enduring visual and experiential harm to the landscape character and visitor appreciation that underpins the local economy.

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers in the western townships, fundamentally depends on the intactness and natural quality of the Atlantic seascape. The proposed development would industrialise this environment, yet none of these communities has been subject to a detailed, place-specific evaluation of the consequential effects. This omission undermines confidence that the applicant has fully understood or mitigated the potential for significant adverse impacts on a vital part of Mull's economy and community identity. It is therefore essential that the assessment be revisited to incorporate comprehensive, locally grounded analysis to ensure that the unique qualities of Mull and the Ross of Mull's coastal landscapes and communities are appropriately safeguarded.

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the

30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant's assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

The applicant's assessment fails to consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has

been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the applicant's distance-based visual impact mitigation approach fails to address adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant's overall assessment.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This approach has a practical consequence: significant impacts on these distant communities are understated or overlooked entirely. Such a method fails to provide a comprehensive and accurate understanding of the environmental effects experienced by all affected populations.

Evidence demonstrates that wherever highly sensitive receptors exist beyond this 20-kilometre threshold, the assessment reduces the perceived severity of impacts. Crucially, the communities living in these areas have not been subjected to any place-based assessment, meaning their specific circumstances and vulnerabilities remain unexamined. This omission undermines the credibility and completeness of the overall environmental impact evaluation.

In light of these concerns, it is clear that the applicant's approach compromises the integrity of the assessment. A more thorough and inclusive methodology is necessary to ensure that all significant effects, regardless of distance, are properly identified and addressed. Without such rigor, the environmental impact assessment cannot be considered fully reliable or fit for the purpose of informing planning decisions.

1.1.813 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: This is a desecration of the most scenic and sacred site in Scotland. Scotland does not need this additional investment in a huge renewable project that is to supply energy to the rest of the UK and provide yet more profit for foreign power companies.

1.1.814 Further Comments

I am appalled that this project has even been considered as suitable at this beautiful place. Say NO

1.1.815 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements, as demonstrated by the applicant's own evaluation. This assessment acknowledges considerable impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, subsequent scrutiny of the applicant's documentation reveals that these impacts have been consistently underestimated. Furthermore, the essential heritage assessment has not been undertaken, and although the adverse effects on the island communities within the project's vicinity were identified, they have never been subjected to a thorough evaluation. The ecological criteria necessary for approval have not been demonstrated as achievable, and notably, only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider granting approval, I request that they require the submission of further environmental information alongside enhanced visual representations. Additionally, I propose that the applications be determined only following a public inquiry, thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the ultimate decision, I further request that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 183
Dear Sir/Madam,

I hereby submit a formal objection to the applications numbered 00012385 and 00012386, submitted by MachairWind Limited (ScottishPower Renewables), seeking consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this correspondence be recorded as an official objection, that I be registered accordingly, and that I receive notification of the outcome of these applications.

The proposals concern the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This project entails the installation of between 91 and 144 turbines, each reaching up to 335 metres to blade tip, within a designated Windfarm Development Area spanning around 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

In evaluating these applications, the statutory and policy framework mandates that the onus lies squarely on the applicant to provide sufficient and compelling evidence to satisfy all relevant planning and environmental tests. Objectors are not required to disprove the application but may rely on the applicant's failure to meet this evidential burden. Having considered the information presented, I conclude that the applicant has not fulfilled this responsibility. Therefore, based on the planning and environmental grounds detailed herein, I urge that consent be refused.

1.1.816 Legislative and Policy Framework

The marine licence application fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Authorisation decisions under this legislation must accord with the National Marine Plan unless material considerations indicate otherwise. The application does not satisfy key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies are integral to the statutory assessment process. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such matters must weigh against the granting of consent. Accordingly, the application's failure to meet these statutory and policy requirements constitutes a clear basis for objection.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making process is

not informed by a full understanding of the environmental consequences, contrary to statutory requirements.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority reveals deficiencies and omissions in demonstrating compliance with these legal obligations. Where such compliance has not been demonstrated, the law and policy framework dictate that these shortcomings must weigh against the granting of consent. Consequently, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement explicitly demands that the interests of island communities be taken into account and given due weight in the decision-making process. The submitted evidence does not demonstrate compliance with this obligation, revealing deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a conflict with the applicable legal and policy framework. In accordance with established principles, where compliance with the Islands (Scotland) Act 2018 is not demonstrated, and where deficiencies or omissions exist, these matters must weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not meet the statutory requirements to properly consider and give due weight to the interests of island communities.

1.1.817 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant’s own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. Furthermore, the applicant’s documentation acknowledges the influence of distance on judgements; for example, an assessment of a coastal area over 30 kilometres away concludes that the scale of change is small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes lie results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the effects the Scottish Ministers are being asked to consider.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot’s visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The applicant acknowledges that the proposed development would give rise to certain effects which engage the provisions of National Planning Framework 4 (NPF4), specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, despite recognising these effects, the applicant has failed to demonstrate that its conclusions regarding the scale of such effects are consistent with the methodology it employed. Crucially, there has been no satisfactory demonstration of compliance with the policies that safeguard nationally important landscapes and seascapes. This omission undermines confidence that the proposal adequately addresses the statutory requirements set out to protect these sensitive environmental assets. Consequently, the proposal does not meet the requirements of the relevant planning policies designed to protect landscape and seascape interests.

1.1.818 Cultural Landscape, Archaeology and Historic Environment

There is significant uncertainty regarding the reliability of the applicant's heritage impact assessment due to apparent non-compliance with the prescribed evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been followed—an approach that emphasises assessing whether changes to setting affect its contribution to cultural significance and whether the integrity of setting is retained, explicitly cautioning against equating visual change with adverse impact—the evidence indicates otherwise. A Methodological Audit, conducted independently and based solely on the applicant's own Appendix 14.3, finds that while the assessment identifies relevant heritage attributes and describes various aspects of visual change such as visibility, distance, and monument prominence, it fails to demonstrate the critical evaluative step required by the

methodology: a clear assessment of how the integrity of setting has been maintained. In other words, the conclusion that the integrity of setting is adequately retained is not substantiated by the analysis presented. This omission calls into question the robustness and validity of the applicant's conclusions on heritage impacts.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The applicant's evidence acknowledges that the heritage conclusions rely significantly on the findings of the landscape assessment. This interdependence is critical because any inaccuracies or shortcomings within the landscape assessment will directly influence the validity of the heritage impact appraisal. It is therefore essential that the landscape effects are thoroughly and accurately evaluated to ensure a reliable overall assessment.

However, it has been identified that the landscape assessment understates the extent of the landscape effects, as outlined previously. This understatement has the effect of diminishing the perceived impact on the heritage assets. Since the heritage conclusions are derived from the landscape assessment, they consequently adopt this understated perspective, potentially leading to an incomplete or overly optimistic evaluation of the heritage impacts.

Given this reliance and the identified deficiencies in the landscape assessment, the credibility of the heritage impact conclusions is undermined. A more robust and transparent approach is required to ensure that heritage effects are fully understood and appropriately weighted within the planning decision-making process. Without this, there remains a risk that the true scale of harm to heritage assets is not properly acknowledged or mitigated.

The application fails to demonstrate adequate mitigation measures to protect heritage assets, falling short of the requirements set out in relevant policy. This

matter engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage interests would be properly protected. This absence of demonstrable compliance with key heritage protection policies undermines the acceptability of the application.

1.1.819 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities identified: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not incidental but form the core attraction sustaining the local visitor economy. The proposed development threatens to alter these very qualities, thereby undermining the fundamental reasons why visitors choose to come.

Any diminution of these key characteristics would have a direct and adverse impact on the economic foundations of these communities. This, in turn, would jeopardise the provision of local services, reduce population stability, and ultimately threaten the long-term social and economic viability of the islands. The proposal therefore poses a significant risk to the continued sustainability of these communities by damaging the essential qualities upon which they depend.

The applicant's assessment methodology notably falls short in its treatment of island communities, particularly when compared to the detailed analysis provided for port communities. While the consultants themselves acknowledged habitability as a significant pathway for potential impacts, no subsequent place-based assessment of the affected islands was undertaken. Instead, the socio-economic appraisal in Chapter 18 operates at a regional scale, focusing in detail on potential port communities but neglecting equivalent scrutiny of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a finding unsupported by targeted evidence.

This regional approach inadequately reflects the realities of small island economies, which are distinct from broader regional averages and are concentrated in sectors most vulnerable to changes in visitor appeal. Reliance on increasing visitor numbers does not mitigate this vulnerability; rather, it intensifies dependence on the very qualities potentially threatened by the proposal. Therefore, the conclusion of low sensitivity, drawn without specific place-based analysis, represents an unsubstantiated assumption rather than a robust, evidence-based finding. Such a methodological flaw undermines the ability to fully understand or appropriately mitigate potential socio-economic impacts on island communities.

The applicant acknowledges that island communities warrant specific and careful consideration within the planning process. However, the evidence demonstrates a failure to undertake the necessary assessment to understand the proposal's effects

on these communities. This omission runs counter to the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting marine and coastal environments be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose statutory obligations to assess and accord weight to the interests of island communities through meaningful engagement from the earliest stages of a proposal through to its conclusion.

In light of this, the proposal has not demonstrated compatibility with the sustainable development of island communities, nor has it satisfied the statutory duties owed to these populations. Without evidence that meaningful engagement has occurred or that the socio-economic impacts have been thoroughly evaluated, the decision-making process fails to align with established policy and statutory frameworks. Accordingly, the proposal cannot be considered compliant with the necessary standards for the protection and promotion of island community interests.

1.1.820 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The very act of submitting these documents is a noteworthy element of the application. It indicates the applicant's recognition that, notwithstanding their own assessment, the Scottish Ministers might reach a different conclusion regarding the potential for adverse effects. Therefore, while these submissions demonstrate the applicant's intention to mitigate possible negative impacts through derogation and compensation measures, they also acknowledge uncertainty surrounding the assessment of harm to the protected site.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is

that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant’s own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.821 Cumulative and In-Combination Effects

The evidence submitted by the applicant highlights a critical procedural deficiency in the current assessment approach. It is noted that only a portion of the project is presently under consideration by the Scottish Ministers, specifically excluding the export cable corridor and the onshore transmission works. These components are essential for the wind farm’s operation but are deferred to future applications. Consequently, the cumulative effects of the entire project are never evaluated collectively, resulting in a fragmented and incomplete assessment.

This segmented approach contravenes established legal principles, as emphasised in the Raeshaw Farms case, which mandates that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts may seem less significant. By deferring key elements to subsequent consenting processes after the principal decision is made, the current methodology undermines the integrity of the environmental assessment and fails to provide decision-makers with a comprehensive understanding of the project's full implications. This procedural flaw calls into question the validity of the current assessment and supports a need for a holistic evaluation of the entire project at this stage.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide a reliable measure of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the assessment is grounded in baseline evaluations that have themselves understated key impacts on the landscape, heritage, and socio-economic factors. As a result, the cumulative assessment does

not fully capture the extent of harm that may arise from the collective developments in the area.

This issue stems from the fact that the cumulative assessments are dependent on conclusions drawn in other parts of the Environmental Impact Assessment. If those underlying assessments begin with a reduced baseline—one that does not adequately recognise the existing conditions and potential sensitivities—then the cumulative effects are inevitably minimised. In other words, any initial understatement of impacts is carried forward, meaning the aggregation of developments appears less significant than it truly is.

Therefore, the cumulative impact assessment as presented cannot be relied upon to inform sound planning decisions. Without an accurate baseline and a thorough evaluation of combined effects, there is a clear risk that the overall consequences for the environment and community are underestimated. This undermines the robustness of the Environmental Impact Assessment and suggests the need for a more comprehensive and accurate approach before the proposal is approved.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.822 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

The environmental information submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. The Environmental Impact Assessment (EIA), while comprehensive in scope, falls short of the required standard of sufficiency. Specifically, the assessment identifies potential pathways to significant effects but fails to investigate these thoroughly or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks demonstrable application of its integrity test; and the socio-economic assessment omits any place-based analysis of the islands directly affected. Furthermore, the application frequently depends on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Consequently, the Scottish Ministers are constrained to base their decision solely on the evidence currently before them, and the applicant has not shown that this environmental information meets the adequacy threshold necessary for proper determination.

1.1.823 Effects on Local Area

There is significant uncertainty surrounding the applicant's assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The development area lies immediately north-west of Islay and west of Colonsay, yet the application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay's own coastline—is central to the applicant's derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with

widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and community impacts on Mull and the Ross of Mull coastal areas, which are integral to the region's tourism economy. The Ross of Mull South coastal area, recognised for its High sensitivity at distances of 22 to 24 kilometres, is attributed only a Medium magnitude of effect, despite the applicant accepting significant impacts at Erraid and on the Core Paths of the Ross. Notably, Fionnphort, the gateway to Iona and primary embarkation point for visitors, is acknowledged as experiencing significant effects, yet the broader community implications bound to the flow of visitors remain inadequately addressed. Similarly, across Mull, significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, a designation of High sensitivity at approximately 21 to 33 kilometres, is attributed no more than Medium magnitude. This disparity suggests a disconnect between recognised sensitivity and the scale of attributed effects, potentially diminishing the perceived impact on these tourism-dependent communities and landscapes.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's reliance on viewing distance—over 30 kilometres—is used to justify judging the scale of change as small. This distance-based reasoning fails to adequately reflect the qualitative and economic significance of the landscape, particularly given the dependence of Mull's west-facing tourism economy on the Atlantic seascape. Wildlife boat operations and the accommodation infrastructure supporting western townships would be affected by the industrialisation of these seascapes, yet none of these communities have

been afforded a place-based assessment. This omission undermines a comprehensive understanding of the development's impact, risking adverse consequences for both the landscape character and the economic vitality of these coastal communities.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite acknowledging its High sensitivity at a distance of approximately 35 kilometres. This conclusion contrasts sharply with the recognised sensitivity of the site, suggesting that the proposed mitigation measures or distance-related factors may have been overestimated in their effectiveness. When compared with other assessments where similar distances and sensitivities have resulted in higher magnitude ratings, this discrepancy indicates an inconsistency that undermines the reliability of the applicant's evaluation.

Tiree's unique topography and landscape character further challenge the Low magnitude conclusion. As an exceptionally low-lying island dominated by expansive sea and sky, its highest elevation, Ben Hynish, reaches only 141 metres. The introduction of turbines up to 335 metres tall would represent vertical structures unprecedented in the island's seascape. Such prominent features would inevitably alter the visual and experiential qualities that define Tiree's character. The assessment's failure to adequately reflect this substantial alteration leads to a significant understatement of potential effects.

In light of these considerations, the applicant's evaluation appears to underestimate the magnitude of change and consequent impacts on Tiree's sensitive and distinctive landscape. This understatement raises concerns about the overall reliability of the assessment, warranting a more thorough and calibrated appraisal to ensure that the full extent of effects on this exposed and valued receptor is properly recognised and addressed.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of the proposed development and whose economies and identities are closely tied to the seascape. For instance, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced nature of Gigha's community and economy means that any changes in the seascape could have profound implications; yet, these have not been examined in the submitted assessment. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptor that the applicant's distance-based moderation approach fails to adequately address, as it diminishes the potential significance of visual and experiential effects at such key viewpoints. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economies are intimately defined by the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts in the vicinity with views towards the development, share this same position. Collectively, these receptors represent sensitive social and economic interests that are unaccounted for in the applicant's evaluation. This lack of assessment undermines the comprehensiveness and reliability of the overall environmental and socio-economic analysis, leaving a gap in understanding the full extent of the development's potential impacts on these mainland and island communities.

The applicant's approach to assessing environmental effects employs a systematic moderation and discounting of impacts on sensitive receptors located beyond approximately 20 kilometres, resulting in a significant underestimation of those effects. Taken together, the evidence demonstrates a clear pattern: wherever a highly sensitive receptor lies beyond this threshold, the magnitude of change is artificially reduced and the resultant effect is correspondingly diminished. Crucially, this approach fails to provide any place-based assessment for the communities experiencing these impacts, effectively overlooking their exposure and the significance of the effects upon them. Such a methodology undermines the integrity of the environmental impact assessment by neglecting the genuine extent and severity of impacts beyond the 20-kilometre boundary.

1.1.824 Personal Observations

In addition to the planning matters above, I am personally concerned because: I love to visit the Isles, because of their landscape and beauty. I prefer that instead of machines that are bad for nature and sea. So I wont't visit it. So less tourists but also a change of climate their, fish that dissapear.

Based on my own local knowledge, I also wish to highlight that: The landscape needs to stay like this. This machines are still bad for our planet. There is no plan for this who are broke and need replacement, there still using a lot of oil.

Finally, I would also ask the Scottish Ministers to consider: Please stop this nonsens. Keep Schotland like it is. This doesn’t help our planet

1.1.825 Further Comments

As a regular visitor of Schotland I would like it to stay like it is

1.1.826 Summary

The proposal for the MachairWind Offshore Wind Farm has not been demonstrated by the applicant to conform with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessments acknowledge significant impacts on nationally designated landscapes as well as on the heritage and communities along this coastline. Published analyses of the applicant’s documentation reveal that the extent of these impacts has been understated, with a critical heritage assessment notably absent. Furthermore, while the proposal identifies effects on the island communities involved, no evaluation of these impacts has been conducted. The ecological requirements associated with the development have also not been shown to be achievable. It is important to note that only a portion of the project is currently submitted for consideration by the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the related marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of additional environmental information and enhanced visual representations. Moreover, it is urged that the applications be determined only subsequent to a public inquiry, thereby allowing a comprehensive examination of the issues raised by this objection. Regardless of the decision reached, it is also sought that the Ministers explicitly address and record their conclusions on the impacts upon cultural heritage and the affected island communities within their reasons for determination.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 184
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications seek approval under section 36 of the Electricity Act 1989 and for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010 respectively. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres of sea. The site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in proximity to the islands and coastal communities of the southern Hebrides.

I request that this letter be registered as a formal objection and that I am notified of the final decision regarding these applications. The grounds for my objection are rooted in both planning and environmental considerations, which I outline below with reference to the statutory and policy framework applicable to the determination of these proposals.

It is important to emphasise that the statutory responsibility to demonstrate compliance with the relevant planning and environmental tests rests entirely with the applicant. Adequate and compelling evidence must be provided by MachairWind Limited to satisfy these requirements. Objectors, including myself, are not obliged to prove the contrary. Upon careful assessment, the applicant has failed to discharge this burden. Consequently, for the reasons articulated in the following sections, the applications do not meet the necessary tests, and consent ought to be refused.

1.1.827 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence confirms that the applicant has not adequately addressed these requirements nor taken reasonable steps to mitigate adverse effects arising from the proposal on these protected interests. Furthermore, the Scottish Ministers, in determining this application, are mandated to have regard to the same statutory duties. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory obligations, constitutes a clear conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance

with the National Marine Plan unless relevant considerations indicate otherwise. This application does not meet that threshold.

The National Marine Plan's General Policies impose clear statutory obligations that the application must satisfy. These include GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 on Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The application has not demonstrated compliance with these policies. There are identifiable deficiencies and omissions in the evidence submitted, which fail to adequately address the potential impacts on the historic environment, landscape character, natural heritage, and cumulative effects. Furthermore, the engagement process and the robustness of the evidence base fall short of the standards required by the National Marine Plan.

Given these failures, the application does not satisfy the statutory assessment criteria. The absence of demonstrated compliance with the National Marine Plan's policies, combined with the evidential shortcomings and procedural deficiencies, weighs decisively against the granting of consent. In accordance with the Marine (Scotland) Act 2010 and the National Marine Plan, the marine licence application should be refused.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for development to protect and enhance biodiversity, safeguard natural places, conserve historic assets, and ensure sustainable energy use.

However, the evidence before the determining authority demonstrates that the proposal fails to comply with these critical policies. There is no satisfactory demonstration of compliance with Policy 3 regarding biodiversity; the application lacks sufficient evidence to show that biodiversity will be protected or enhanced as required. Similarly, under Policy 4, the proposal does not adequately address the protection of natural places, with omissions in the assessment of impacts on the local environment and natural features. Regarding Policy 7, the application fails to provide the necessary evidence to confirm that historic assets and places will be conserved or that any harm will be appropriately mitigated. Finally, the proposal does not meet the requirements of Policy 11 on energy, as it does not demonstrate adherence to sustainable energy principles or the minimisation of energy consumption in line with the policy's objectives.

Given these deficiencies, omissions, and conflicts with the applicable legal and policy framework, the proposal does not satisfy the requirements of NPF4. As established in the applicant's own evidence, where compliance has not been demonstrated, or where such shortcomings exist, these matters weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it

fails to comply with the key policies of National Planning Framework 4 relevant to biodiversity, natural places, historic assets, and energy.

The applicant's submission must be considered in the context of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests.

In this case, the evidence before the determining authority does not demonstrate compliance with these fundamental legal requirements. The environmental impact assessment provided fails to adequately identify and assess the likely significant environmental effects as required by the 2017 Regulations and their marine equivalents. Furthermore, the Habitats Regulations assessment is incomplete and does not satisfy the statutory tests necessary to ensure protection of European designated sites. The absence of a comprehensive and robust assessment framework undermines the ability of the authority to make an informed decision that complies with the law.

Where compliance with these statutory duties has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must be given substantial weight against the granting of consent. The failure to provide a satisfactory environmental impact assessment and habitats regulations assessment constitutes a clear breach of the statutory requirements and represents a significant procedural and evidential deficiency.

Accordingly, on the basis of the applicant's failure to meet the mandatory environmental impact assessment and habitats regulations obligations, the proposal should not be granted consent.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement explicitly demands that the interests of island communities be identified, assessed, and given due weight in the decision-making process. The absence of clear evidence demonstrating compliance with this obligation means that the proposal does not meet the legal standards set by the Act. Consequently, the decision-making process is flawed, undermining the statutory protections intended to safeguard island communities' unique social, economic, and environmental circumstances.

Furthermore, the failure to demonstrate compliance with the Islands (Scotland) Act 2018, coupled with the presence of omissions and deficiencies in addressing island community interests, constitutes a direct conflict with the applicable legal and policy framework. As established, where such deficiencies or omissions exist, they must weigh against the granting of consent. The proposal's inability to adequately engage with or reflect the statutory requirements for island communities therefore represents a significant material consideration that should lead to refusal. This failure not only

contravenes the statutory duty but also compromises the integrity of the planning process in relation to island community interests.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental breach of the evidential burden incumbent upon the applicant. The submitted documentation contains deficiencies and omissions that remain unaddressed, resulting in unresolved conflicts with the applicable legal and policy framework. Given that compliance has not been satisfactorily demonstrated, these shortcomings must weigh decisively against the granting of consent. In conclusion, the application does not meet the necessary evidential standards to satisfy legal and policy obligations and therefore should be refused.

1.1.828 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. While the policy expressly supports renewable energy development, such support is contingent upon adherence to specific impact tests, notably those concerning effects on communities and the environment. This conditional approach means that renewable energy initiatives must operate within the parameters established by Policy 11, rather than overriding them.

Careful examination reveals that the proposal fails to satisfy these crucial policy requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, which are afforded strong protection under Policy 11(d) and 11(e). Furthermore, the cultural significance of scheduled monuments and their settings has not been demonstrated to be preserved, raising concerns under Policy 11(c) regarding impacts on communities. The potential harm to island communities has also not been adequately addressed or safeguarded against.

Moreover, the ecological tests embedded within Policy 11 have not been shown to be met based on the evidence submitted. This further undermines the proposal’s compliance with the policy and calls into question the overall appropriateness of the development in its current form. Given these substantial uncertainties and conflicts, it is clear that the proposal does not align with the impact criteria fundamental to NPF4 Policy 11.

The practical consequence of the proposed development is that it would result in significant adverse effects on a range of nationally important designated assets, contravening several key policies within NPF4. Specifically, the proposal would undermine the qualities for which National Scenic Areas and other nationally important landscapes have been designated, as set out in Policy 4(c) and 4(d). This is compounded by the failure to demonstrate adequate protection for the cultural significance of scheduled monuments and their settings, contrary to the requirements of Policy 7, including Policy 7(h) and Policies 7(c) and 7(d). Furthermore, the proposal does not show how island communities would be safeguarded, nor does it meet the ecological criteria established under Policy 3 on

biodiversity. These shortcomings collectively indicate a clear conflict with the intended protective framework of NPF4.

In analysing these policy conflicts, it is evident that the proposal falls short in addressing the full scope of the protections afforded to designated landscapes, heritage assets, and biodiversity. The evidence submitted does not satisfy the necessary tests to prevent significant adverse effects on nationally designated landscapes and seascapes. Likewise, there is an absence of convincing demonstration that the cultural and historic values of scheduled monuments and their settings would be preserved. The failure to confirm that island communities would be appropriately safeguarded further highlights the incompatibility of the proposal with the comprehensive policy approach required by NPF4. Given these factors, the proposal cannot be considered compliant with multiple, interrelated policies designed to protect nationally important assets.

The applicant's evidence acknowledges that the proposal would adversely affect the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2, as well as other relevant terrestrial development policies. This demonstrates a clear conflict with the development plan framework insofar as it relates to land-based effects. Furthermore, the proposal is inconsistent with the National Planning Framework 4 when considered in its entirety, and the applicant has not provided sufficient justification to overcome this fundamental conflict. Consequently, the proposal fails to accord with the established terrestrial planning policies that protect the local environment and community interests.

1.1.829 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant's written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant's own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described

do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual evidence provided. According to this guidance, printed visualisations cannot fully replicate the scale that a viewer experiences in the field. This acknowledgement underscores that such visual materials offer only an approximation of real-world perception rather than a precise or comprehensive representation.

Furthermore, wireline drawings included within the panoramic projections share these same constraints. As technical renderings embedded within the visualisations, they do not serve as independent correctives but rather reflect the limitations of the accompanying photographic images. Consequently, while these materials assist in understanding potential visual impacts, their interpretive value must be considered within the context of these acknowledged technical and perceptual shortcomings.

The development would introduce aviation and navigation lighting to a sea horizon that is presently unlit, permanently altering the character of the night-time seascape for the stated 35-year operational life. This change is significant because the current absence of such lighting contributes to the natural quality and tranquillity of the nocturnal seascape. Moreover, the operational lifespan does not limit the policy harm: consenting to this development effectively designates this seascape as appropriate for wind farm use, thereby accepting the permanent alteration of its night-time character. This has important implications for the protection of seascape qualities under relevant policy considerations.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.830 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with that body. This methodology

emphasises the need to evaluate whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is adequately retained, explicitly cautioning against equating visual change directly with adverse impact. However, a published Methodological Audit prepared in support of community objections, working solely from the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The Audit highlights that the assessment describes visual changes but does not perform the necessary evaluative step to establish whether the integrity of setting is preserved, a deficiency apparent in all examined worked examples. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the thoroughness of the applicant's assessment.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a complex set of qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape. It also recognises the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints.

Historic Environment Scotland, in their consultation responses recorded within the application, requested the inclusion of additional viewpoints to ensure that these broader experiential qualities are fully captured. This suggests that the initial assessment may not have adequately represented the wider cultural landscape and the nuanced ways in which the heritage assets are appreciated and experienced.

Given these considerations, it is important that any further assessment or mitigation fully embraces the dynamic and relational nature of the cultural significance identified. Without this, the potential impacts on the heritage assets could be underestimated, leading to an incomplete understanding of the effect on the cultural landscape as a whole.

The mitigation measures proposed rely heavily on the findings of the landscape assessment, which serves as a foundational element for evaluating heritage impacts. However, where the landscape effects have been understated, as previously detailed, this has a direct and compounding effect on the credibility of the heritage conclusions. The extent to which landscape changes influence heritage assets is therefore not fully acknowledged, leading to an overall mitigation strategy that may be insufficiently robust.

This interdependency reveals a critical weakness in the assessment framework. Because the heritage conclusions are derived from the landscape assessment, any underestimation of landscape effects inherently carries through to the heritage impact analysis. Consequently, the conclusions regarding heritage impacts cannot be considered fully reliable, calling into question the adequacy of the mitigation measures and the broader planning judgement based upon them.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.831 Effects on Island Communities, Tourism and the Local Economy

When assessing the proposal, it is important to consider whether any mitigation measures can adequately address the impacts on the island communities' visitor-attracted qualities. The applicant's baseline evidence recognises landscape, seascape, cultural heritage, tranquillity and remoteness as the key attributes drawing visitors. However, no mitigation can fully preserve these intrinsic qualities once altered by development. The loss or diminution of such attributes cannot be compensated by typical remedial measures, as their fundamental character and appeal are inherently linked to the unspoilt and undisturbed environment.

The exceptional dependence of these island communities on visitors means that any adverse change to these qualities strikes directly at their economic foundation. This impact is not confined to tourism revenue alone but extends to the provision of local services, population stability and the broader social viability of the islands. Consequently, the proposal poses a significant threat to the ongoing sustainability of these communities, undermining the very factors that support their existence and well-being.

The applicant's own consultants acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, detailing potential impacts on port communities while omitting an equivalent, place-based examination of the island communities directly facing the development. This approach leads to the conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of targeted, location-specific analysis.

Such a conclusion fails to recognise the distinctive nature of small island economies, which are not adequately represented by regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the environmental and social qualities that attract visitors. Far from mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these at-risk qualities. Therefore, the assertion of low sensitivity to tourism impacts, unsupported by detailed place-based assessment, amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw undermines the robustness of the socio-

economic assessment and calls into question the adequacy of the methodology to understand or mitigate the proposal's effects on island communities.

The applicant acknowledges that island communities require particular scrutiny in the planning process. However, the assessment undertaken falls short of the necessary standard to understand the proposal's effects on these communities. This deficiency is significant given the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite these explicit requirements, the applicant has failed to demonstrate that the proposal is compatible with the sustainability of island communities, nor has it evidenced that the statutory duties owed to them have been fulfilled. The lack of meaningful engagement and comprehensive assessment undermines the ability to ensure that the development will not adversely affect these communities. Consequently, the proposal does not comply with the necessary planning policies and statutory obligations designed to protect the social and economic wellbeing of island populations.

1.1.832 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support notable populations of seabirds, marine mammals, and basking sharks. The proposed project would bring construction, operational, and decommissioning activities on a very large scale, extending over several decades, thereby introducing sustained pressures on these ecologically sensitive environments.

Given the recognised ecological importance and sensitivity of the site and its adjacent marine habitats, the potential for significant adverse environmental effects from the development is substantial. The presence of protected species and priority features necessitates careful consideration of the impacts that such large-scale and long-term activities may impose on biodiversity and habitat integrity.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these

documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied, as evidenced by their own derogation documents. This failure to meet the legal requirements for safeguarding these ecological features fundamentally undermines the justification for granting consent. On the evidence submitted, the applicant's case lacks the requisite degree of certainty that these critical protections will be upheld. Therefore, the application should be refused on the basis of non-compliance with statutory obligations.

1.1.833 Cumulative and In-Combination Effects

The current application assesses only a portion of the overall development, omitting critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. Consequently, these significant elements are deferred to separate future applications and are not evaluated alongside the principal proposal. This fragmented approach contravenes established legal principles, as confirmed by the courts in Raeshaw Farms, which mandate that a project must be considered in its entirety rather than segmented into smaller parts to minimise perceived impacts. By failing to assess the full scope of the project collectively, the decision-making process is compromised, undermining the comprehensive evaluation of environmental and planning effects required for a lawful and robust determination.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide an accurate picture of the combined effects of the proposal alongside other existing, consented, and foreseeable developments. This arises because the assessment is founded on baseline data from the Environmental Impact Assessment that understates effects across landscape, heritage, and socio-economic factors. As a result, the starting point for cumulative evaluation is already diminished, leading to a systematic underestimation of the true cumulative impacts.

Furthermore, the flawed baseline assessments compromise the reliability of the cumulative impact conclusions. Since each component assessment underreports the degree of harm or change, the cumulative assessment compounds these inaccuracies rather than correcting them. This methodological weakness means that decision-makers are not presented with a robust understanding of how this proposal interacts with other developments, thereby undermining confidence in the planning process and its outcomes.

There remains significant uncertainty regarding compliance with essential planning policies and environmental regulations, specifically concerning the issue of project splitting and the assessment of cumulative effects. The applicant has not sufficiently demonstrated that the combined and in-combination impacts of the proposal, including the effects of the project in its entirety, have been thoroughly and reliably identified or evaluated. This omission is particularly pertinent given the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, alongside the stipulations of NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations.

In light of these shortcomings, it is imperative that the decision-making process explicitly addresses the treatment of deferred works associated with the project. Without clear and comprehensive consideration of these elements, the assessment remains incomplete and potentially non-compliant with the relevant policy framework and regulatory duties. Therefore, I respectfully request that the determination expressly incorporates an evaluation of the deferred works to ensure full adherence to planning and environmental requirements.

1.1.834 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the weight the Scottish Ministers are asked to place on the site-selection process renders the quality of public participation in that process directly material. However, significant deficiencies in participation during both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case. Furthermore, GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, require that those affected have a realistic opportunity to engage with decisions of this magnitude. The conditions imposed on the affected communities fall short of this standard, thereby undermining the

legitimacy of the site-selection process. It is therefore imperative that Ministers give due regard to these deficiencies when considering the representations made.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.835 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. However, the application’s assessment inadequately recognises Islay’s role as an impacted island community, instead predominantly considering it as a potential project location. This approach fails to provide any place-based evaluation of the effects on Islay’s Atlantic-facing communities, whose proximity to the development area inevitably influences their setting, local economy, and community life.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Notably, the North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same deficiencies in the heritage assessment, particularly regarding the treatment of its open maritime setting. Consequently, the

application’s evaluation of environmental and heritage impacts on these islands is insufficiently robust and reliable.

The applicant’s assessment significantly underestimates the scale and importance of the visual and community impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with extensive visibility and a moderate but significant overall effect extending approximately 21 kilometres, where turbines span around 39 degrees of the horizon. Similarly, the West Coast of Iona, including its highest point at Dùn Ì, is acknowledged as highly sensitive with widespread visibility, and the applicant accepts significant effects for residents and visitors. Despite this, the assessment fails to fully address the community’s concerns and the implications for habitability, a pathway of impact recognised by the applicant’s own consultants but never properly examined.

Iona’s heritage assets, notably its internationally important monastic landscape comprising the Abbey, the Nunnery, and the high crosses, are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba’s Bay at Càrn Cùl ri Èirinn. This omission compromises the accuracy of the heritage impact assessment and fails to reflect the true extent to which the development would affect the island’s cultural significance and visitor experience.

The practical implications of the visual scale are stark when compared to familiar landmarks. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at about 33 kilometres, would be dwarfed by the proposed turbines, which would exceed it in height by approximately 194 metres at roughly two-thirds of the distance. This comparison underscores the overwhelming presence the turbines would have on the island’s landscape and the lived experience of its community. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting the depth of local opposition and reinforcing that the assessment’s conclusions do not reflect the community’s perspective or the development’s true impact.

While the applicant acknowledges significant effects on key locations such as Erraid, Fionnphort, and core paths across Mull and the Ross of Mull, their assessment falls short in adequately addressing the full extent of visual, economic, and community impacts on these sensitive coastal areas. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only a Medium magnitude of effect, despite its importance as a gateway for visitors to Iona and its direct connection to the local community reliant on tourism flows. Similarly, within Mull itself, significant effects are accepted on core recreational paths and within designated landscape areas including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is consistently assessed as High sensitivity at distances between 21 and 33 kilometres; yet the applicant limits the magnitude of effect to Medium, thereby underrepresenting the potential for adverse impact. Furthermore, the applicant’s reliance on distance-

based reasoning is evident in their treatment of the Wilderness and Gribun Rocks coastal area, where a viewing distance exceeding 30 kilometres leads them to conclude that the scale of change is small, an approach that this representation challenges as insufficient given the sensitivity of the landscape. Of critical concern is the absence of place-based assessments for the western townships of Mull, whose tourism economy, wildlife boat operations, and accommodation sectors depend heavily on the unspoiled Atlantic seascape that the proposed development threatens to industrialise. This lack of detailed, community-specific consideration undermines confidence in the applicant's evaluation and fails to address the significant implications for these tourism-dependent coastal communities and designated landscapes.

The applicant's assessment recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva's recovery is dependent on the preservation of its natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly affects the reliability of the overall evaluation of the development's landscape and visual impacts on Tiree. By underestimating the magnitude of change, the assessment risks providing decision-makers with an incomplete understanding of the true scale of effects on this sensitive area.

Tiree's distinctive landscape character is defined by its exceptionally low-lying topography and the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, underscoring the open and expansive oceanic horizon that shapes its sense of place. Introducing turbines up to 335 metres tall would create vertical structures of unprecedented scale within this seascape, fundamentally altering the visual experience and character of the island. Such a

dramatic visual intrusion cannot reasonably be characterised as having a Low magnitude of change.

In light of these considerations, the applicant's conclusion exemplifies a severe understatement of the effects on Tiree. The assessment's failure to fully acknowledge the scale of visual and landscape impact on this highly sensitive receptor undermines the reliability of its findings. Consequently, the evaluation should be revisited to ensure that the distinctive and vulnerable character of Tiree is adequately protected in the planning process.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

The applicant's reliance on a distance-based approach to assess environmental effects results in a systematic underestimation and discounting of significant impacts on sensitive receptors located beyond 20 kilometres from the development site. This methodological choice has a practical consequence: important changes experienced by these distant communities are not given appropriate weight in the environmental impact assessment. Consequently, the assessment does not accurately reflect the true extent or significance of effects that occur beyond this arbitrary distance threshold.

In examining the evidence, it becomes clear that wherever the applicant's assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is deliberately moderated and the effect discounted. This means that although these receptors may be affected to a considerable degree, the assessment process effectively diminishes their experience of impact. Such an approach fails to provide a comprehensive or place-specific analysis for these communities, thereby compromising the assessment's integrity and robustness.

The absence of a place-based assessment for communities beyond 20 kilometres undermines the environmental impact assessment's ability to fully inform decision-makers and the public. Without acknowledging and properly evaluating the effects experienced by these sensitive receptors, the applicant's approach risks overlooking meaningful environmental and social consequences. It is therefore essential that the

assessment methodology be revised to accurately capture and weigh the significance of effects at all relevant distances, ensuring a thorough and credible evaluation.

1.1.836 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, independent analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the necessary heritage assessment has not been completed, and although the effects on the island communities affected by the development were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological requirements have not been demonstrated as achievable. It is also important to note that only a portion of the overall project is currently under consideration by the Scottish Ministers.

In light of these deficiencies, I urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence application. Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations of the proposal. Moreover, I recommend that determination of the applications be deferred until after a public inquiry has taken place, thereby allowing thorough examination of the concerns raised in this objection. Regardless of the outcome, I ask that the Scottish Ministers explicitly address and provide clear reasoning on the effects of the development on cultural heritage and the impacted island communities within their decision statement.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 185
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) for the MachairWind Offshore Wind Farm, referenced under application numbers 00012385 and 00012386. These applications request consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this objection be formally recorded, that I be registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals envisage the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. The development would involve between 91 and 144 wind turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning approximately 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated against the applicable statutory and policy frameworks guiding the determination of these applications. It is important to emphasise that the evidential responsibility lies with the applicant, who must demonstrate—through robust and sufficient evidence—that all relevant statutory tests and policy criteria are met. Objectors are not obliged to prove the contrary. In this case, for the reasons detailed below, the applicant has failed to satisfy this burden of proof, and therefore, the applications should be refused.

1.1.837 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This fundamental obligation is not adequately addressed in the submitted documentation, leaving significant uncertainty as to whether these important environmental and heritage considerations have been properly accounted for.

Moreover, the applicant has not shown that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. The absence of clear evidence or detailed mitigation measures directly conflicts with the statutory requirement to minimise harm to these valued features. Such omissions represent a critical deficiency in the application and undermine confidence that the proposal can be delivered without unacceptable impacts.

Given these failures to meet the statutory duties under Schedule 9, and the lack of demonstrated compliance, the application is in conflict with the applicable legal and policy framework. As established, where such deficiencies and omissions exist, they weigh decisively against the granting of consent. Therefore, the application should

be refused on the basis that it does not satisfy the statutory requirements imposed by the Electricity Act 1989.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby precluding proper authorisation. Under Part 4 of the Marine (Scotland) Act 2010, decisions must accord with the National Marine Plan unless other relevant considerations apply. The application does not satisfy key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The absence of demonstrated compliance, alongside identified deficiencies and omissions in the evidence, constitutes a direct conflict with the applicable legal and policy framework. As such, these failures weigh decisively against the granting of consent for the marine licence.

The proposal fails to demonstrate any proper consideration or weighting of the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement explicitly obliges decision-makers to ensure that the interests of island communities are identified, assessed, and given due weight throughout the planning process. The absence of such evidence in the application materials constitutes a fundamental procedural and substantive deficiency.

The Islands (Scotland) Act 2018 establishes a clear legal framework that must be adhered to in all relevant planning decisions. Where compliance with this framework is not demonstrated, or where the evidence reveals omissions or conflicts with the statutory requirements, these shortcomings must weigh decisively against the granting of consent. In this case, the proposal's failure to address the statutory duty to consider island communities' interests represents a direct conflict with the applicable legal and policy framework.

Given the statutory imperative and the absence of any evidence that the proposal has met this requirement, the application cannot be regarded as compliant with the Islands (Scotland) Act 2018. This failure is a critical flaw that undermines the legitimacy of the decision-making process and justifies refusal of consent. Accordingly, the proposal should be rejected on the basis that it does not properly consider or give due weight to the interests of island communities as required by law.

1.1.838 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria outlined in NPF4 Policy 11, resulting in significant adverse consequences for both the environment and local communities. Although Policy 11 supports renewable energy development, this support is conditional and must operate within the constraints of specific impact assessments, notably those addressing effects on communities, landscapes, seascapes, and other sensitive receptors.

In particular, the proposal would cause substantial harm to nationally designated landscapes and seascapes, undermining their protected status. Additionally, there is

insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has not been adequately addressed, raising concerns about the social implications of the development. Furthermore, the ecological assessments provided do not convincingly show that the necessary environmental tests can be met.

Given these unresolved issues, the proposal conflicts directly with the requirements of NPF4 Policy 11. It cannot be supported as it stands, since the adverse impacts on heritage, landscape, community, and ecology run counter to the policy's intended balance between renewable energy advancement and environmental protection.

The proposal would result in significant adverse impacts on landscape, heritage, and community interests within the area governed by the Argyll and Bute Local Development Plan 2. These effects are directly contrary to the protections afforded by the relevant terrestrial development plan policies, which seek to safeguard these valued attributes from inappropriate development. This conflict is clear and quantifiable in terms of the harm caused to the local environment and community well-being.

In assessing the proposal against the wider planning framework, it is evident that these conflicts are not isolated but extend to the development plan as a whole. The proposal fails to align with the strategic objectives and specific policies designed to preserve the character and integrity of the area. This inconsistency undermines the cohesive planning approach intended by the Local Development Plan 2, which is integral to maintaining sustainable land use and community interests.

Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy direction. The applicant has not provided evidence to demonstrate compliance or justify departures from the established development plan framework. On this basis, the proposal should be refused as it fundamentally conflicts with the statutory planning policies that govern terrestrial development and community protection within Argyll and Bute.

1.1.839 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit during night-time hours, thereby permanently altering the character of the seascape for the entire 35-year operational life of the project. This quantifiable change to the night-time environment represents a significant and enduring modification to the visual experience of the coastal area, one that is not presently subject to artificial illumination. Such a transformation is substantive, given that the seascape's existing unlit condition contributes materially to its intrinsic character and the public's perception and enjoyment of this maritime landscape after dark.

It is important to note that the 35-year operational period does not diminish the policy implications of this impact. Granting consent for this development would effectively signify a policy determination that this particular seascape is appropriate for wind farm use, with all attendant changes to its night-time character deemed acceptable. This decision would set a precedent that the introduction of permanent lighting—and

the consequent alteration of the night-time seascape—is compatible with the area's designated use and value. Such a conclusion requires careful consideration of the balance between renewable energy objectives and the protection of seascape character, as enshrined in relevant planning policy frameworks.

The proposal fails to demonstrate adequate mitigation when assessed against the requirements of key planning policies safeguarding landscape and seascape interests. Specifically, the applicant has not shown that its conclusions regarding the scale of the acknowledged effects align with its own assessment methodology. Consequently, there is no clear evidence that the proposal complies with the protections afforded to nationally important landscapes and seascapes. These shortcomings engage the provisions of National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Taken together, this indicates that the proposal does not meet the necessary policy standards intended to safeguard these valued environmental assets.

1.1.840 Cultural Landscape, Archaeology and Historic Environment

The assessment presented by the applicant does not fully adhere to the required methodology for evaluating effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. While the applicant utilises Historic Environment Scotland’s established methodology—which rightly emphasises the need to evaluate whether changes to setting affect its contribution to cultural significance and whether the integrity of that setting is retained—the assessment departs from these principles in practice. The methodology expressly clarifies that visual change alone should not be equated with adverse impact.

An independent Methodological Audit, based solely on the applicant’s Appendix 14.3, demonstrates that although the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been evaluated as required by the methodology. Instead, the assessment focuses on describing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequate. Crucially, the essential evaluative step demanded by the methodology is absent from all examples examined, undermining confidence in the applicant’s conclusions.

The practical consequence of the application’s failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies

7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.841 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

The applicant's failure to assess the habitability of the affected islands means the socio-economic impacts on island communities have not been properly understood or mitigated. Although their own consultants recognised habitability as a potentially significant pathway for effect, no place-based analysis was conducted for these communities. Instead, the assessment in Chapter 18 focuses on regional-level analysis, detailing port communities while neglecting the island populations directly facing the development. Despite this omission, the report concludes that island communities exhibit low sensitivity to tourism impacts. This conclusion is fundamentally flawed. Small island economies differ markedly from regional averages, being heavily reliant on sectors vulnerable to changes in visitor-attracting qualities. Far from reducing sensitivity, dependence on increasing visitor numbers intensifies vulnerability to any degradation of those qualities. Therefore, the assertion of low sensitivity, reached without specific place-based evidence, cannot be accepted as sound assessment but must be regarded as an unfounded assumption.

The proposal fails to meet essential planning and statutory requirements concerning island communities, resulting in an inadequate foundation for decision-making. Without sound socio-economic evidence and a precautionary approach where such evidence is absent, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, the assessment is fundamentally flawed. This deficiency undermines compliance with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which

obligate meaningful engagement and careful consideration of island communities' interests throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny but did not conduct the necessary assessment to understand the potential impacts on these communities. This omission means the proposal cannot be demonstrated to be compatible with sustaining island communities, thereby failing to discharge the statutory duties owed to them. The absence of appropriate evaluation and engagement represents a significant shortcoming in the planning submission.

In light of these considerations, the proposal should not be approved as it does not satisfy the legal and policy framework designed to protect island communities. It is imperative that any development likely to affect these communities undertakes thorough assessment and meaningful engagement to ensure compliance with the relevant statutory duties and national planning policies.

1.1.842 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting important species such as seabirds, marine mammals, and basking sharks. This establishes the site's significant ecological value and sensitivity. The proposed development would involve construction, operation, and decommissioning activities on a very large scale and over several decades, thereby posing a considerable risk of adverse environmental effects. Given the recognised presence of protected species and habitats, the scale and duration of the project warrant thorough assessment and mitigation to prevent substantial harm to these vulnerable marine ecosystems.

The applicant's submission of both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan indicates an acknowledgment of potential adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared in situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. This approach implicitly recognises that existing mitigation measures may be insufficient to prevent harm to the designated site and its qualifying features.

Importantly, the submission of these derogation and compensation documents is a notable element of the application, as it reflects the applicant's understanding that the Scottish Ministers might reach a different conclusion regarding the likelihood of adverse effect. This procedural step underscores the uncertainty around the impacts and the necessity for compensatory measures should derogation be granted. Consequently, the reliance on these Without Prejudice documents calls for careful scrutiny to ensure that any potential harm is appropriately addressed and that the integrity of the protected site is preserved in accordance with relevant conservation obligations.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, are insufficient on their own to satisfy the stringent

requirements set by the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be convinced beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the habitat in question. This represents a high evidential threshold which the applicant bears the burden of demonstrating, ensuring that no residual uncertainty remains regarding potential harm.

This legal framework is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, they underscore the critical importance of safeguarding protected habitats and species, mandating that any consent be contingent on the strict derogation tests being met. Consequently, the policy and legislative context demands rigorous scientific certainty rather than reliance on proposed mitigation alone.

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.843 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the project, excluding critical components such as the export cable corridor and the onshore transmission works, without which the wind farm cannot operate. By deferring these essential elements to later applications, the cumulative effects of the entire project are never considered collectively. This fragmentation means that significant impacts will be evaluated only through subsequent consenting processes, occurring after the principal decision has been made.

Such an approach fundamentally undermines the integrity of the planning process. It contravenes the established legal principle, as affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than being segmented

into smaller parts whose individual effects may appear less significant. Consequently, the current method is procedurally flawed and cannot ensure a comprehensive evaluation of the project's true impacts.

The Environmental Impact Assessment’s cumulative impact assessment relies fundamentally on the findings established in preceding sections covering landscape, heritage, and socio-economic factors. However, as demonstrated, these underlying assessments have systematically understated the magnitude of effects. Consequently, the baseline from which cumulative impacts are evaluated is inherently reduced. This foundational underestimation compromises the reliability of the cumulative assessment, as the initial data fails to fully capture the extent of existing conditions and sensitivities.

Building upon a diminished baseline inevitably results in an undervaluation of the combined effects of the proposed development alongside other existing, consented, and foreseeable projects. The cumulative impact assessment, therefore, presents a misleadingly moderate appraisal of overall impacts. This flawed approach risks obscuring the true scale and severity of potential cumulative harm, undermining the robustness of the Environmental Impact Assessment and the soundness of decision-making predicated upon it.

The failure to adequately assess the cumulative and in-combination effects of the proposed development has practical consequences for the robustness of the planning decision. Without a comprehensive evaluation of the project as a whole, including deferred works, the decision-maker cannot fully understand the environmental impacts, potentially leading to unforeseen harm and ineffective mitigation measures.

This shortfall constitutes non-compliance with established planning policies and environmental regulations. Specifically, the proposal engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations regarding project splitting. These policies and regulations require that all related works are considered collectively to ensure a reliable identification and assessment of effects.

In light of this, it is essential that the determination explicitly addresses the treatment of deferred works and their cumulative impacts. Only by doing so can the decision-making process align with statutory requirements and provide a sound basis for sustainable development.

1.1.844 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient environmental information to make a fully informed decision on the application. The assessment fails to adequately investigate all identified pathways to significant effects, relying instead on methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not

demonstrate the application of its own integrity test; and the socio-economic assessment lacks a place-based analysis of the islands directly affected.

Furthermore, the application depends in some instances on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding issues. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be understood before the application is determined. The regulatory framework is clear that these matters must be resolved through the evidence presented at the time of decision-making, not deferred to a later stage.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to discharge their statutory duties. Without sufficient and comprehensive evidence, there is a risk that the decision will be made without a full understanding of the environmental impacts, which undermines the purpose of the EIA process and the statutory requirements it seeks to uphold.

1.1.845 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on Iona, with practical consequences for the accuracy of the environmental and social impact evaluation. The Coastal Character assessment itself attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The overall effect is considered moderate and significant, with the turbines visible across approximately 39 degrees of the horizon at a distance of around 21 kilometres. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors throughout much of the

island, including at Dùn Ì, the island's highest point. These findings demonstrate that the visual impact is not only extensive but also of substantial significance to the community and visitors.

Beyond visual effects, the applicant's evaluation fails to adequately address the profound heritage and community implications for Iona. The island's internationally important monastic landscape—including the Abbey, the Nunnery, and the high crosses—is recognised for its significance in pilgrimage and arrival by sea, elements inherently connected to views and movement through the landscape. Despite Historic Environment Scotland's request for additional visualisations, including from the ferry crossing, no visualisation has been provided from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the potential effect on habitability—a pathway acknowledged by the applicant's own consultants—was never assessed. The scale of the turbines relative to familiar landmarks also underscores the visual dominance; for instance, Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres at roughly two-thirds of that distance. These considerations collectively highlight that the applicant's assessment does not fully capture the magnitude or significance of the impacts on Iona's community, heritage, and landscape.

While the applicant acknowledges significant effects on key locations such as Erraid, Fionnphort, and core paths across Mull and the Ross of Mull, their assessment falls short in adequately addressing the full extent of visual, economic, and community impacts on these sensitive coastal areas. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only a Medium magnitude of effect, despite its importance as a gateway for visitors to Iona and its direct connection to the local community reliant on tourism flows. Similarly, within Mull itself, significant effects are accepted on core recreational paths and within designated landscape areas including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is consistently assessed as High sensitivity at distances between 21 and 33 kilometres; yet the applicant limits the magnitude of effect to Medium, thereby underrepresenting the potential for adverse impact. Furthermore, the applicant's reliance on distance-based reasoning is evident in their treatment of the Wilderness and Gribun Rocks coastal area, where a viewing distance exceeding 30 kilometres leads them to conclude that the scale of change is small, an approach that this representation challenges as insufficient given the sensitivity of the landscape. Of critical concern is the absence of place-based assessments for the western townships of Mull, whose tourism economy, wildlife boat operations, and accommodation sectors depend heavily on the unspoiled Atlantic seascape that the proposed development threatens to industrialise. This lack of detailed, community-specific consideration undermines confidence in the applicant's evaluation and fails to address the significant implications for these tourism-dependent coastal communities and designated landscapes.

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard

landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the 30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant's assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

The applicant's assessment notably understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an unreliable evaluation of effects. While the South Tiree coastal area is acknowledged as having High sensitivity at a distance of approximately 35 kilometres, it is paradoxically attributed a Low magnitude of change. This evaluation fails to adequately recognise the unique qualities of Tiree, an exceptionally low-lying island whose landscape character is fundamentally shaped by the dominance of sea and sky. With its highest point, Ben Hynish, reaching only 141 metres, the introduction of turbines up to 335 metres tall would create vertical elements that are unprecedented within its seascape. Given that Tiree's character is defined by an open oceanic horizon, the presence of such towering structures would represent a substantial and highly conspicuous alteration. Therefore, the conclusion of a Low magnitude of change for such an exposed and sensitive receptor exemplifies the significant understatement of effects identified in this objection.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the proposed development area, resulting in an incomplete evaluation of potential impacts. This omission carries practical consequences for those communities whose

well-being and local economies depend on the seascape, as their concerns remain unaddressed and their interests inadequately represented in the planning process.

Notably, the community-owned island of Gigha, a nationally recognised symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced community and economy of Gigha have not been examined in the applicant's assessment, despite the likely sensitivity of this receptor to changes in seascape character and visual amenity. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the kind of receptors affected by the distance-based visual impact moderation that this objection highlights, yet they have not been properly accounted for.

Further, the chain of communities along the west coast of Kintyre, whose character and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters, share a comparable vulnerability. The Treshnish Isles and other small islands and mainland coasts with views towards the development area are similarly positioned. The exclusion of these receptors from the assessment undermines the comprehensiveness of the applicant's evaluation and risks overlooking adverse effects on the social and economic fabric of these interconnected communities. For these reasons, the assessment must be revisited to include a thorough appraisal of impacts on all relevant mainland and island receptors.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantifiable underestimation of the impact on these distant communities, which the assessment fails to address with any place-based consideration. Consequently, significant effects that extend beyond this arbitrary threshold remain unacknowledged in the evaluation process.

Such moderation of effects beyond 20 kilometres undermines the integrity of the entire assessment. By applying a blanket distance-based cutoff, the applicant's methodology disregards the lived experience of communities encountering these impacts, thereby omitting vital context and nuance. This omission leads to a distorted understanding of environmental consequences, particularly for those receptors that, despite their sensitivity, fall outside the narrowly defined assessment zone.

In light of this systematic discounting and the absence of tailored evaluation for affected communities beyond 20 kilometres, the environmental impact assessment cannot be considered comprehensive or robust. It is imperative that the assessment methodology be revised to incorporate place-based analysis for all sensitive receptors, irrespective of distance, to ensure that all significant effects are properly identified and addressed.

1.1.846 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities involved were identified, no comprehensive assessment of these impacts has been undertaken. Furthermore, the ecological criteria pertinent to the proposal have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently submitted for Ministerial consideration.

In light of these substantial shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence.

Should the Ministers consider proceeding without refusal, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the applications be determined only following a public inquiry, thereby allowing the issues raised in this objection to be thoroughly examined. Regardless of the decision reached, I further request that the Ministers provide clear conclusions within their reasons specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 186
Dear Sir/Madam,

I hereby formally oppose the MachairWind Offshore Wind Farm proposals submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386, seeking consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010 respectively. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination relating to these applications.

The development in question proposes an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines each reaching up to 335 metres in height to blade tip. The proposed site occupies a Windfarm Development Area of around 448 square kilometres in the sea to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

The following discussion presents the planning and environmental grounds for objection, firmly grounded in the statutory and policy context applicable to the determination of these proposals. It must be emphasised that the onus lies entirely with the applicant to provide adequate evidence demonstrating compliance with all relevant legal and policy tests. Objectors bear no responsibility to disprove the application. Upon careful consideration, it is evident that the applicant has failed to meet this evidential burden, and for the reasons elucidated herein, the applications should be refused consent.

1.1.847 Ecology, Biodiversity and Habitats Regulations

While mitigation measures are proposed, they are unlikely to fully address the significant risks posed to Priority Marine Features and Annex I habitats present within the development area. The surrounding waters also support important populations of seabirds, marine mammals, and basking sharks, all of which would be exposed to disturbances from large-scale construction, operation, and decommissioning activities extending over several decades. Given the ecological sensitivity and the scale and duration of the proposed development, there is a substantial potential for significant adverse environmental effects that mitigation alone cannot adequately prevent.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The very inclusion of such materials within the application highlights the applicant’s recognition of potential impacts on designated environmental interests.

It is important to note that the submission of these derogation and compensation documents indicates a precautionary approach by the applicant, acknowledging that

the proposed development may affect the protected guillemot population. By providing these plans, the applicant seeks to demonstrate a commitment to mitigating any such impacts should the competent authority, in this case the Scottish Ministers, determine that an adverse effect on site integrity cannot be ruled out. This approach reflects an understanding that the Scottish Ministers may reach a different conclusion regarding the potential for harm than the applicant has presented.

The presence of these documents as part of the application is therefore a significant feature, as it signals preparedness to address and manage any identified adverse effects through derogation provisions and compensatory measures. This submission aims to ensure that, in the event of an adverse effect being confirmed, appropriate steps will be taken to protect the guillemot population and maintain the overall integrity of the North Colonsay and Western Cliffs Special Protection Area.

The applicant's evidence clarifies that under the Habitats Regulations, planning consent for developments potentially affecting protected sites can only be granted if the competent authority is satisfied that the proposal will not adversely affect the integrity of the site. This assessment must reach a standard where no reasonable scientific doubt remains regarding the absence of adverse effects, unless the proposal meets the strict derogation tests outlined in the legislation. The responsibility for demonstrating compliance with these tests lies firmly with the applicant. Furthermore, the presence of mitigation, compensation measures, or future monitoring arrangements does not, in isolation, satisfy the statutory requirements or provide a lawful basis for consent.

This legal framework is supported by the policy context, engaging not only the Habitats Regulations but also GEN 9 and GEN 13 of the National Marine Plan, as well as relevant provisions of National Planning Framework 4, specifically Policies 3, 4(b), 4(e), and 4(f). Together, these policies reinforce the stringent evidential standards that must be met to ensure the protection of designated habitats and species. In light of this comprehensive legal and policy regime, any planning consent granted without incontrovertible scientific assurance would be contrary to established statutory and policy requirements.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.848 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is a significant undermining of the legitimacy of the site-selection process. The applicant urges the Scottish Ministers to place substantial weight on this process; however, the inadequate opportunities for meaningful engagement at both the plan and site-selection stages have persisted into the current application phase. The

application itself encompasses thousands of pages of complex technical documentation, yet the consultation period coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is particularly limited. This imbalance is stark, especially considering the applicant has had years of preparation supported by considerable professional and financial resources.

The National Marine Plan's guidance, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by such decisions must have a genuine and realistic opportunity to engage. The conditions imposed on the island communities in this instance fall short of that established standard. This shortfall in meaningful engagement compromises the fairness and inclusiveness that underpin sound decision-making processes in matters of this scale and significance.

In light of these considerations, it is imperative that the Scottish Ministers give due weight to the inadequacies of the consultation process when evaluating the representations presented. Failure to adequately address these deficiencies would not only diminish public confidence in the planning system but also risk decisions being made without the full and fair input of those most directly affected. Therefore, the consultation process as it stands cannot be regarded as meeting the required standards of effective public participation.

The practical consequence of the insufficiency of the Environmental Impact Assessment (EIA) submitted is that the Scottish Ministers are unable to make a fully informed decision on the application. The EIA serves as the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. Across key topics, the application identifies potential significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate the conclusions reached. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals is inadequate, as the EIA Regulations require that likely significant effects are understood prior to determination. Consequently, the Scottish Ministers must base their decision on the evidence presently before them, not on the assumption that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information provided meets this requirement, rendering the EIA insufficient for the purpose of determination.

1.1.849 Effects on Local Area

The applicant's assessment significantly underrepresents the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Despite Islay and Colonsay being the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location rather than as an affected community in its own right. This approach neglects the Atlantic-facing

communities on Islay that confront the nearest edge of a 448 square kilometre development area, with no place-based analysis of the impacts on their setting, local economy, or community life.

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The practical consequence of the applicant's assessment is a substantial underestimation of the visual and social impacts on Iona, which affects the reliability of the environmental and social impact evaluation. The Coastal Character assessment clearly identifies the Sound of Iona as having high sensitivity, with direct orientation towards the proposed development and extensive visibility. The turbines would be visible across a large geographical area, approximately 21 kilometres away, spanning about 39 degrees of the horizon. This significant visual intrusion extends to the West Coast of Iona, also recognised as highly sensitive with widespread visibility. The applicant concedes that residents and visitors throughout much of the island, including those at Dùn Ì—its highest point—would experience significant effects. Notably, the scale of the turbines is considerable when compared to familiar landmarks; for instance, the tallest turbines would exceed Ben Hynish on Tiree, a 141-metre high landmark seen from Iona at 33 kilometres, by around 194 metres despite being visible at only two-thirds of that distance.

Furthermore, the assessment fails to adequately account for Iona's internationally important monastic heritage, which is intrinsically linked to pilgrimage, arrival by sea, and landscape movement. Historic Environment Scotland's request for additional visualisations, including viewpoints from the ferry crossing and elevated ground such as Càrn Cùl ri Èirinn above St Columba's Bay, has not been met, leaving a critical gap in understanding the heritage impact. Community perspectives further highlight this shortfall: a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal. Despite this, the applicant's own consultants identified habitability as a potential pathway for impact on the community, yet no assessment of this has been undertaken. Taken together, these omissions and understatements compromise the accuracy of the overall impact evaluation and raise serious concerns about the adequacy of the applicant's approach.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed Medium magnitude. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and the primary embarkation point for visitors, where the community is most directly affected by visitor flows. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic

Area, which encompasses Mull's western waters and islands and is assessed as High sensitivity throughout at distances of 21 to 33 kilometres, is nonetheless attributed no more than Medium magnitude.

However, this assessment relies heavily on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to the viewing distance exceeding 30 kilometres, a conclusion that this representation identifies as insufficiently reflective of actual visual and experiential impacts. Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, depends fundamentally on the integrity of the Atlantic seascape that the development would industrialise. Despite this, none of these communities has received a place-based assessment tailored to their specific economic and social context.

In summary, the applicant's approach underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities. This omission undermines a full understanding of the effects on these sensitive and economically reliant coastal areas.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This conclusion contrasts sharply with the nature of the receptor, as Tiree's landscape character is exceptionally distinctive and vulnerable. Unlike other areas where vertical structures may be more commonplace or mitigated by existing

features, Tiree's topography is uniquely low-lying and defined by its openness to sea and sky.

Tiree's highest elevation, Ben Hynish, reaches only 141 metres, while the proposed turbines would rise to 335 metres, introducing unprecedented vertical elements into an otherwise horizontal seascape. This significant alteration to the island's defining characteristics cannot be adequately captured by a Low magnitude rating. Such an understatement leads to an unreliable evaluation of the impacts on Tiree's sensitive landscape character, warranting a reassessment that properly reflects the scale of change proposed.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

1.1.850 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, a closer scrutiny of the submitted documents reveals that these significant effects have been underestimated. Crucially, the necessary heritage assessment has not been undertaken, and although impacts on the island communities have been identified, they remain unassessed. Furthermore, it has not been demonstrated that the ecological safeguards mandated by law can be complied with. Compounding these concerns, only a portion of the entire project is subject to the Ministers' consideration at this stage.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers decline consent for the MachairWind Offshore Wind Farm proposal and refuse the related marine licence application.

Should the Ministers consider not to refuse outright, it is requested that they require the submission of additional environmental information alongside enhanced visual representations of the development. Furthermore, it is proposed that the applications be determined only following a public inquiry, thereby allowing all objections and issues raised to be fully and properly examined. Regardless of the final decision, it is also sought that the Ministers clearly articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 187
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. This letter should be recorded as an objection, with my status as an objector noted, and I request to be informed of the outcome of these applications.

The development under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area extending over approximately 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal communities of the southern Hebrides.

The subsequent sections articulate the grounds for objection, grounded in both planning and environmental considerations. These are framed by the statutory and policy context that governs the determination of these applications. It is important to emphasise that the onus of proof lies entirely with the applicant, who must provide adequate evidence to satisfy the relevant statutory and policy tests. Objectors bear no obligation to disprove the proposals. Having carefully assessed the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, consent should be withheld.

1.1.851 Conflict with National Planning Framework 4 and the Development Plan

Although NPF4 Policy 11 supports renewable energy development, that support is expressly conditional on meeting the policy's impact criteria, including those relating to communities, landscapes, seascapes, and other receptors. In this case, the proposal fails to comply with these essential criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, thereby undermining their protection. Furthermore, there is no adequate demonstration that the cultural significance of scheduled monuments and their settings would be preserved. The proposal also does not show that island communities would be safeguarded from negative impacts. Finally, the ecological requirements set out in the policy have not been satisfactorily addressed or evidenced. Consequently, the proposal conflicts with NPF4 Policy 11 and cannot be supported under its provisions.

The proposal's mitigation measures fall short when compared against the comprehensive safeguards established by relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be considered alongside Policy 4(c) and 4(d), which explicitly protect National Scenic Areas and nationally significant landscapes from significant adverse impacts on their defining qualities. Additionally, Policy 7, particularly 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the settings of historic assets, imposes stringent requirements to preserve cultural significance. Policy 3 further demands robust ecological safeguards. The submitted evidence does not demonstrate that the

proposed mitigation would adequately prevent significant harm to these designated assets, thereby failing to meet the combined intent and standards of these policies.

In light of the evidence, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. There is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be protected in accordance with policy expectations. Furthermore, the ecological tests required under Policy 3 have not been shown to be capable of being met based on the information provided. Consequently, the proposal is in clear conflict with multiple NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity, and therefore should not be supported.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These effects are material to the land-based environment and directly conflict with the policies designed to protect these valued attributes. As such, the proposal's quantified detrimental influence on these elements cannot be overlooked or mitigated within the existing planning framework.

Given these findings, it is clear that the proposal is inconsistent with the relevant development plan framework. The Local Development Plan 2 explicitly seeks to preserve the character and integrity of the area's landscape and heritage assets, which the proposal would compromise. Furthermore, this inconsistency extends to the National Planning Framework 4 when considered in its entirety, as the applicant has failed to demonstrate compliance or provide evidence to the contrary.

In conclusion, the proposal is fundamentally at odds with the established terrestrial development plan policies and the overarching national framework. This conflict undermines the rationale for granting consent and strongly supports refusal. The adverse effects on landscape, heritage, and community interests weigh decisively against the proposal, and it should therefore be rejected in accordance with the statutory development plan and national planning policy.

1.1.852 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment's conclusions fail to provide a reliable description of the effects the Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual evidence provided. According to this guidance, printed visualisations cannot fully replicate the scale that a viewer experiences in the field. This acknowledgement underscores that such visual materials offer only an approximation of real-world perception rather than a precise or comprehensive representation.

Furthermore, wireline drawings included within the panoramic projections share these same constraints. As technical renderings embedded within the visualisations, they do not serve as independent correctives but rather reflect the limitations of the accompanying photographic images. Consequently, while these materials assist in understanding potential visual impacts, their interpretive value must be considered within the context of these acknowledged technical and perceptual shortcomings.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

The proposal's failure to comply with key planning policies has tangible consequences for the protection of nationally important landscapes and seascapes. This non-compliance undermines the effectiveness of the planning framework designed to safeguard these valuable environments, potentially leading to significant and unacceptable adverse effects. The practical outcome is that the proposal cannot be supported as it risks causing harm contrary to established policy objectives.

Specifically, the effects of the development engage several relevant policies, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7

and paragraph 4.28 of the National Marine Plan. These policies collectively set out clear requirements to ensure that landscape and seascape interests are preserved and enhanced where possible. The applicant has not shown that the conclusions drawn about the scale of these effects align with the methodology it employs, creating uncertainty and a lack of confidence in the assessment provided.

Moreover, the absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes and seascapes, the planning authority cannot reasonably be expected to grant consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.853 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, leading to significant doubts about the reliability of its conclusions concerning the setting of historic assets. By not properly evaluating whether changes to setting affect the contribution setting makes to cultural significance, the assessment undermines confidence in its findings. This methodological shortfall is critical because it impedes a proper understanding of whether the integrity of setting is adequately retained, a fundamental consideration in assessing heritage impacts.

Historic Environment Scotland's recognised methodology, which the applicant claims to have adopted, explicitly requires an evaluation that goes beyond the mere description of visual changes. While the methodology involves consideration of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it clearly states that visual change alone should not be equated directly with adverse impact. The assessment, however, focuses primarily on these visual factors without demonstrating the essential evaluative step of assessing setting integrity, as prescribed by the methodology.

A Methodological Audit, prepared in support of community objections and based entirely on the applicant's own Appendix 14.3, confirms these concerns. It highlights that although the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been assessed in line with the accepted methodology. The audit notes that this evaluative stage is missing in all the worked examples examined. Consequently, the assessment's conclusion that the integrity of setting is adequately retained lacks the necessary methodological foundation, calling into question the validity of its heritage impact conclusions.

While the applicant's assessment recognises certain mitigation measures aimed at reducing harm to heritage assets, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that confer significance. The baseline evidence acknowledges that the cultural value of the affected heritage assets is not solely derived from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. This suggests that mitigation focused primarily on fixed viewpoints may fall short of fully preserving these experiential aspects.

Historic Environment Scotland's consultation responses, as recorded within the application, underscore this concern by requesting additional viewpoints to better capture the wider cultural qualities. Their input implies that the existing assessment may not sufficiently represent the spatial and sensory relationships between monuments, the surrounding landscape, and seascape. Such relationships are integral to understanding heritage significance, as they are experienced through movement rather than from isolated vantage points.

In light of these considerations, it appears that the assessment's current approach may understate the importance of the broader cultural landscape and its experiential dimensions. Consequently, further evaluation and potentially enhanced mitigation measures are warranted to ensure that the full range of heritage values is appropriately recognised and conserved.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.854 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the potential impact of the proposed development on the fundamental qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity, and remoteness as central to the visitor experience. Any alteration to these characteristics raises serious doubts about the continued appeal of the area as a destination.

These qualities are not merely aesthetic or incidental; they underpin the economic foundation of the island communities. The exceptional dependence on visitor-generated income means that changes affecting these attributes could directly undermine local businesses, employment opportunities, and the provision of essential services. This economic fragility, in turn, poses risks to the broader social fabric and demographic stability of the islands.

Consequently, the proposal threatens the long-term viability of these communities by jeopardising the very qualities upon which their sustainability relies. Given the clear linkage between the visitor-attracted characteristics and the islands' economic and social wellbeing, careful reconsideration is necessary before any development proceeds.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

The proposal fails to meet the necessary planning and statutory requirements for assessing and protecting island communities, resulting in a significant shortfall in compliance with established policies and duties. According to GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where evidence is incomplete. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are thoroughly assessed and given due weight through meaningful engagement from the earliest stages through to the conclusion of the process. Despite recognising the particular scrutiny required for island communities, the applicant has not conducted the necessary assessment to understand the proposal's effects on these populations. Consequently, there is no demonstrated compatibility with the sustainability of island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. In summary, the proposal does not comply with key policy and statutory frameworks aimed at safeguarding island communities, and as such, it falls short of the standards required for approval.

1.1.855 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of

protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant's submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty regarding the potential impacts on these ecological features, undermining the applicant's position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.856 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is presently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to subsequent applications. These elements are essential for the operation of the wind farm, yet their effects are excluded from the current assessment. Consequently, the cumulative impacts of the entire project are never evaluated together. This fragmented approach directly contradicts the legal principle established in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than segmented into smaller parts whose individual effects may seem less significant. By postponing the consideration of vital components until after the principal decision, the current process undermines comprehensive evaluation and risks overlooking significant environmental and planning impacts.

1.1.857 Public Engagement, Site Selection and Environmental Information

The Environmental Impact Assessment (EIA) submitted with the application serves as the principal evidential basis for the determination process. However, its sufficiency is brought into question by a number of critical deficiencies identified across several key topics. Notably, the application highlights pathways to significant

environmental effects but fails to investigate them comprehensively. For instance, the landscape assessment reaches conclusions based on a distance pattern that is not supported by the methodology it purports to follow. Similarly, the heritage assessment does not adequately demonstrate the application of its stated integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis pertinent to the affected islands, thereby omitting essential context for understanding potential impacts. These shortcomings indicate that the assessment does not meet the standard required to fully inform decision-making.

Compounding these issues, the application relies in several instances on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding matters. This approach is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be comprehensively understood before the determination of the application. The Scottish Ministers are obliged to make their decision based on the evidence currently before them and cannot assume that unresolved issues will be satisfactorily addressed at a later stage. Given the inadequacies of the environmental information provided, the applicant has not demonstrated that it is adequate for the purposes of informed and lawful decision-making. Consequently, the environmental information accompanying the application is insufficient to support its approval.

1.1.858 Effects on Local Area

There remains considerable uncertainty regarding the true scale and significance of the proposed development's impacts on Iona, which raises fundamental concerns about the reliability of the applicant's environmental and social impact assessment. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon at a distance of around 21 kilometres, creating an effect that the assessment itself qualifies as Moderate and Significant. Despite these findings, the full implications for Iona's community and heritage appear insufficiently explored.

The West Coast of Iona is also recognised as highly sensitive, with widespread visibility of the development acknowledged by the applicant, who accepts that significant effects would be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the highest point. However, critical elements of Iona's heritage—its internationally important monastic landscape comprising the Abbey, the Nunnery, and the high crosses—are intimately connected with pilgrimage, arrival by sea, and movement through the landscape, as stated in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints to better understand potential impacts, including from the ferry crossing itself, yet no visualisations have been provided from key elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a significant gap in understanding the visual effects on this heritage setting.

Community response further underscores the gravity of these concerns. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Moreover, the applicant's consultants identified habitability as a potential pathway of

effect on this community, yet no assessment of this critical issue has been undertaken. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at approximately 33 kilometres; the proposed turbines, at roughly two-thirds of that distance, would exceed Ben Hynish's height by approximately 194 metres, indicating a far greater visual dominance than the assessment suggests. Taken together, these factors demonstrate that the applicant's evaluation underestimates the scale and significance of the impacts on Iona, casting doubt on the accuracy and comprehensiveness of the environmental and social impact appraisal.

The applicant's assessment methodology reveals a consistent pattern whereby sensitive receptors located beyond approximately 20 kilometres are subject to a systematic moderation of the magnitude of change, resulting in a discounted evaluation of the effects experienced. This approach effectively diminishes the significance of impacts on these distant communities, as the assessment does not incorporate any place-based analysis tailored to their specific circumstances. The consequence is an environmental impact assessment that overlooks the nuanced and potentially substantial effects on populations residing beyond this arbitrary distance threshold.

Such a distance-based criterion undermines the integrity of the environmental impact assessment by failing to adequately recognise and address the experiences of highly sensitive receptors at greater distances. The absence of place-specific evaluation for these communities means that their exposure to environmental changes is neither fully understood nor properly mitigated. This methodological shortcoming calls into question the comprehensiveness and reliability of the applicant's assessment, suggesting that significant effects may be systematically underestimated and discounted, thereby weakening the overall robustness of the environmental evaluation.

1.1.859 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a regular to the island for pilgrimage the environment to all sea land and bird populations should not be affected. I would re think coming to tge island so uslanders luvelihoid will be affected.

Based on my own local knowledge, I also wish to highlight that: Seals etc, fish, bird life

Finally, I would also ask the Scottish Ministers to consider: Is this modern day highland clearances through the back door? tourists come for the calm quiet dark environment. No tourists no money for locals

1.1.860 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements, as demonstrated by the applicant's own evaluation. This assessment acknowledges considerable impacts upon nationally

designated landscapes, as well as on the coastal communities and their heritage. However, subsequent scrutiny of the applicant's documentation reveals that these impacts have been consistently underestimated. Furthermore, the essential heritage assessment has not been undertaken, and although the adverse effects on the island communities within the project's vicinity were identified, they have never been subjected to a thorough evaluation. The ecological criteria necessary for approval have not been demonstrated as achievable, and notably, only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider granting approval, I request that they require the submission of further environmental information alongside enhanced visual representations. Additionally, I propose that the applications be determined only following a public inquiry, thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the ultimate decision, I further request that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 188
Dear Sir/Madam,

I hereby formally register my objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request to be recorded as an objector and to receive notification of the final decision regarding these applications.

The project in question involves the development of an offshore wind farm with an estimated capacity of around 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. This development is planned within a designated Windfarm Development Area spanning approximately 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in the planning and environmental considerations relevant to these applications, assessed against the statutory and policy framework governing such developments. It is important to emphasise that the responsibility lies with the applicant to provide robust and sufficient evidence to meet the required planning tests. Objectors, including myself, are not obliged to disprove the applicant's case. In light of the evidence presented, the applicant has failed to satisfy the necessary criteria, and therefore, the applications should be refused consent.

1.1.861 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence confirms that these statutory requirements have not been adequately addressed.

Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers must have regard to these duties in the application and determination process. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application's consideration of these statutory factors, constitutes a direct conflict with the applicable legal and policy framework. Such failures are material and weigh decisively against the granting of consent.

Given the statutory importance of preserving natural beauty and protecting heritage and ecological assets, the application's shortcomings in addressing these duties undermine its legitimacy. The lack of adequate mitigation measures further exacerbates the adverse impacts on these protected interests. Consequently, the application does not meet the statutory threshold required under Schedule 9 of the Electricity Act 1989, and this failure must be given significant weight in the decision-making process.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence showing conformity with these policies undermines the statutory assessment process required for authorisation decisions.

Given that compliance with these policies has not been demonstrated, and the evidence reveals deficiencies and omissions in the application's consideration of the applicable legal and policy framework, these failures weigh decisively against the granting of consent. The application's shortcomings in addressing the National Marine Plan's requirements constitute a fundamental procedural and substantive defect that precludes lawful authorisation under the Marine (Scotland) Act 2010. Accordingly, the marine licence should be refused.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 concerning Biodiversity, Policy 4 relating to Natural Places, Policy 7 addressing Historic Assets and Places, and Policy 11 on Energy. These policies establish clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural environments, the conservation of historic assets, and the responsible use of energy resources within development proposals.

However, the evidence presented fails to demonstrate compliance with these critical policies. There are identifiable deficiencies and omissions in the applicant's documentation that undermine the ability to confirm adherence to the biodiversity and natural places requirements set out in Policies 3 and 4. Similarly, the proposal does not adequately address the protection and management of historic assets as required by Policy 7, nor does it provide sufficient evidence to satisfy the energy considerations mandated by Policy 11. These shortcomings represent clear conflicts with the applicable legal and policy framework established by NPF4.

Given that compliance with these policies has not been demonstrated, and in light of the identified deficiencies and omissions, these matters weigh decisively against the granting of planning consent. The failure to meet the statutory and policy requirements of NPF4 in relation to biodiversity, natural places, historic assets, and energy is a material planning consideration that must be afforded significant weight in the determination of this application. Consequently, the proposal should be refused on the basis that it conflicts with the fundamental provisions of the National Planning Framework 4.

This proposal fails to provide the requisite environmental impact assessment and habitats regulations assessment as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact

Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of a development be identified, assessed, and reported prior to any decision. The submitted documentation does not satisfy these obligations, lacking a comprehensive and robust evaluation of environmental impacts.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these tests, nor does it provide adequate information to rule out adverse effects on designated habitats. This omission constitutes a fundamental procedural and substantive failure.

Where compliance with these statutory requirements has not been demonstrated, and where deficiencies and omissions are evident, such failings must weigh decisively against the granting of consent. The absence of a lawful and complete environmental impact assessment and habitats regulations assessment renders the application deficient and incompatible with the legal and policy framework governing such developments. Consent should therefore be refused.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met, as the evidence before the determining authority reveals deficiencies and omissions in addressing the specific needs and circumstances of island communities affected by the development.

The Islands (Scotland) Act 2018 explicitly requires that decision-makers take into account the unique social, economic, and environmental characteristics of island communities. However, the application lacks any substantive assessment or meaningful engagement that would satisfy this legal requirement. There is no clear evidence that the proposal has been evaluated in the context of its impact on island communities, nor that their interests have been adequately weighed against other considerations.

Where compliance with the Act has not been demonstrated, and where the evidence identifies such deficiencies and omissions, these matters must weigh against the granting of consent. The absence of a proper and thorough consideration of island community interests constitutes a material failure in the planning process and conflicts with the applicable legal and policy framework. Consequently, the proposal should be refused on this basis alone.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortfall in meeting the evidential burden necessary for the determination of this application. Without such comprehensive demonstration, the application cannot be considered to have satisfied the legal and policy frameworks that govern the proposal.

Moreover, the evidence submitted contains clear deficiencies and omissions that undermine the applicant's case. These gaps in the documentation and assessment process mean that critical statutory and policy obligations remain unaddressed. The absence of conclusive proof of compliance with all applicable requirements is a material consideration that weighs heavily against the granting of consent in this instance.

In conclusion, the applicant's inability to meet the essential responsibility of demonstrating full compliance with the legal and policy framework is a decisive factor. As established in the evidence, where such compliance is not demonstrated, or where conflicts and omissions exist, these matters must be given significant weight in the decision-making process. Therefore, the application should be refused on the grounds that the applicant has not fulfilled the necessary evidential burden.

1.1.862 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. While NPF4 Policy 11 endorses such development, this support is explicitly conditional upon adherence to its impact provisions, including Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) addressing impacts on landscape, seascape, and other receptors. The proposal does not satisfy these criteria and consequently conflicts with the policy's requirements.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, a matter of considerable weight in the planning balance. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments submitted fail to confirm that the necessary environmental protections can be achieved. Taken together, these shortcomings establish a clear conflict with NPF4 Policy 11's impact tests, indicating that the proposal should not attract policy support.

The proposal must be considered in light of the suite of relevant policies within NPF4 designed to safeguard nationally important landscapes, heritage assets, and biodiversity. As outlined, Policy 11 operates alongside Policies 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally significant landscapes from substantial adverse impacts on their defining qualities. In addition, Policy 7, including subsection (h), addresses the protection of scheduled monuments and their settings, while subsections (c) and (d) focus on the broader historic environment. Policy 3 further establishes requirements for biodiversity conservation. Together, these policies form a comprehensive framework aimed at preventing unacceptable harm to designated assets.

Upon detailed examination, the proposal fails to demonstrate compliance with these interrelated policy requirements. It would result in significant adverse effects on designated landscapes and seascapes, undermining the very qualities for which these areas are nationally recognised. Furthermore, there is an absence of sufficient

evidence to confirm that the cultural significance of scheduled monuments and their settings would be adequately protected. The proposal also does not convincingly address the safeguarding of island communities, which are integral to the character and sustainability of these areas. Lastly, the ecological assessments submitted do not satisfy the necessary tests to confirm that biodiversity impacts can be appropriately mitigated or compensated.

In summary, the evidence presented establishes that the proposal conflicts with multiple NPF4 policies intended to protect designated assets of national importance. The significant adverse effects on landscapes and heritage assets, coupled with unresolved ecological and community safeguarding concerns, weigh against the proposal's acceptability under the relevant planning framework. This conflict necessitates careful reconsideration to ensure alignment with the statutory objectives of NPF4.

The applicant's evidence acknowledges that, in so far as the terrestrial development plan is material to the effects experienced on land, including the Argyll and Bute Local Development Plan 2, the proposed development would result in adverse impacts. Specifically, the proposal would detrimentally affect the landscape character, heritage assets, and community interests that the relevant policies within the Local Development Plan seek to protect. These elements are integral to the local planning framework's objectives for sustainable and sensitive land use, and the proposal's failure to avoid harm in these respects is a significant point of concern.

Consequently, this adverse impact establishes a clear conflict between the proposal and the development plan framework, as well as with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or justified. As such, the proposal stands contrary to the established policy framework designed to safeguard the terrestrial environment and community well-being within Argyll and Bute, reinforcing the case for its refusal on planning grounds.

1.1.863 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to establish a clear distance threshold beyond which major effects cease, undermining the reliability of its predicted impacts. Although Appendix 16.1 does not specify such a threshold, independent analysis of the applicant's Chapter 16 and related appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This implicit distance-based limitation is further evidenced by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is considered small due to viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes effectively understates the inputs to the protective tests. Consequently, the conclusions drawn from this methodology cannot

be regarded as a reliable description of the effects that Scottish Ministers are being asked to consent.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the stated 35-year operational lifespan. This change would be a novel feature in an environment that has, until now, been characterised by natural darkness, thereby affecting the visual experience of the area during night-time hours.

It is also noted that the 35-year operational period does not represent a limit on the potential harm in policy terms. The decision to grant consent for this development would effectively amount to a determination that this particular seascape is suitable for wind farm use. Such a decision carries significant weight, as it establishes a precedent regarding the acceptability of lighting effects and their impact on the character of the night-time environment.

In balancing these considerations, it is important to recognise the lasting implications of introducing permanent lighting into an unlit seascape, alongside the policy recognition that consent equates to suitability for wind farm development in this location. Any assessment of the proposal must therefore carefully weigh the visual and character impacts against the broader policy framework governing offshore wind farm siting.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage the provisions set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish clear requirements for the protection of nationally important landscapes and seascapes, which the proposal does not adequately address.

Furthermore, the applicant has not demonstrated that its conclusions regarding the scale of the acknowledged effects align with the methodology it has employed. This lack of consistency raises serious doubts about the reliability of the assessment and

undermines confidence in the proposal's claimed compliance with the relevant policy framework. Without robust evidence that the methodology has been correctly applied, the assessment cannot be considered sufficiently rigorous.

In light of these points, the proposal does not meet the necessary requirements of the planning policies protecting nationally significant landscape and seascape assets. Consequently, it should not be supported as it stands, given the clear shortcomings in demonstrating policy compliance and the potential for unacceptable adverse effects on protected environmental interests.

1.1.864 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland's established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Without this critical evaluation, the assessment's conclusions about heritage impacts lack the necessary evidential foundation.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

There remains significant uncertainty as to whether the application complies with key policy requirements concerning heritage protection. The proposal engages NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) on setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of internationally and nationally important heritage assets and their settings.

However, the applicant has failed to demonstrate adequately that these heritage assets and their settings will be protected. Crucially, the Scottish Ministers do not have before them the comprehensive assessment necessary to support such a conclusion. In the absence of this essential information, the application cannot be deemed acceptable in terms of heritage policy compliance.

1.1.865 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal's effect on the qualities that draw visitors must be considered with the utmost seriousness.

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity,

derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

The practical consequence of the proposal's failure to adequately assess its impact on island communities is that it cannot be considered compliant with the necessary planning and statutory requirements. The applicant's acknowledgement that island communities require particular scrutiny was not followed by the comprehensive assessment needed to understand the effects on these communities. As a result, there is no evidence demonstrating that the proposal aligns with the principles of sustainable island communities.

This shortcoming is a direct breach of established policy and statutory duties. Specifically, the proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence, applying a precautionary approach where evidence is insufficient. It also involves NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and accorded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process.

In conclusion, the proposal falls short of meeting the criteria set by the relevant policies and statutory obligations designed to protect island communities. Without fulfilling these duties, the proposal cannot be regarded as acceptable in planning terms and should be reconsidered or refused to ensure the safeguarding of island communities' interests.

1.1.866 Ecology, Biodiversity and Habitats Regulations

The proposed development would introduce extensive construction, operational, and decommissioning activities into an environment recognised for its ecological sensitivity, including Priority Marine Features and Annex I habitats present within the site. These activities would occur over several decades, representing a scale and duration of disturbance far exceeding typical mitigation capacities. While mitigation measures may be proposed to reduce impacts, the sheer magnitude and longevity of the development's footprint present a significant challenge to their effectiveness.

Furthermore, the surrounding waters serve as habitat for protected species such as seabirds, marine mammals, and basking sharks, all of which could be adversely affected by the development's activities. The presence of these species, alongside the Priority Marine Features and Annex I habitats, underscores the ecological importance of the area and the potential for significant adverse environmental effects. Given these factors, the proposal raises substantial concerns regarding its compatibility with the conservation of sensitive marine ecosystems.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be

confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

Consent for developments that may affect protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement, established under the Habitats Regulations, imposes a rigorous evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. Consequently, the applicant bears the full burden of proof to satisfy this high threshold.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies underscore the necessity for stringent assessment and caution in decision-making concerning developments impacting protected natural assets, ensuring that environmental safeguards are paramount.

It is important to note that mitigation strategies, compensation measures, or proposals for future monitoring cannot, in isolation, fulfill the statutory tests required under the Habitats Regulations. Only where these rigorous conditions are met without reasonable scientific doubt may consent be lawfully granted. This framework ensures that protection of habitats and species is not compromised by speculative or insufficiently evidenced development proposals.

The assessment of the submitted evidence, notably the applicant’s own derogation documents, clearly indicates a failure to satisfy the statutory tests designed to protect internationally important habitats and species. The information provided does not demonstrate the requisite degree of certainty that these legal requirements can be met. Consequently, this shortfall fundamentally undermines the justification for granting consent in this instance.

1.1.867 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that it fails to provide a comprehensive evaluation of the project’s overall impacts, as only part of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—both essential for the wind farm’s operation—are excluded and deferred to subsequent applications. This fragmentation means that the cumulative effects of the entire project are never assessed together, but instead are considered piecemeal through later consenting processes after the principal decision has been made. Such an approach directly contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, which requires a project to be assessed in its entirety rather than being artificially divided into smaller components whose individual impacts may appear

less significant. Consequently, the current assessment methodology is legally and procedurally flawed, undermining the integrity of the environmental evaluation and the decision-making process.

The proposed mitigation measures outlined in the Environmental Impact Assessment must be carefully weighed against the baseline from which cumulative effects are assessed. However, the cumulative impact assessment relies heavily on the conclusions of the landscape, heritage, and socio-economic evaluations conducted earlier in the report. Given that these foundational assessments appear to understate certain effects, the effectiveness of mitigation cannot be fully appreciated without addressing this initial shortfall.

It is important to recognise that the cumulative assessment effectively compounds any underestimation present in the underlying baseline. If the baseline itself minimises impacts, then the aggregation of this proposal with other existing, consented, and foreseeable developments will similarly reflect an artificially reduced scale of combined effects. This means the true cumulative impact on landscape character, heritage assets, and local socio-economic conditions may be significantly greater than reported.

Therefore, the cumulative effects assessment as presented is unreliable and does not provide a robust foundation for decision-making. Until the initial landscape, heritage, and socio-economic assessments are revisited to ensure accurate representation of impacts, the cumulative assessment cannot be considered a sound basis for concluding that the combined effects of development will be acceptable. Further scrutiny and refinement are necessary to establish a realistic understanding of cumulative impacts.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.868 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers accord significant weight to the site-selection process; accordingly, the quality of public participation within that process is directly material. Evidence highlights that deficiencies in participation at both the plan and site-selection stages have persisted into the application phase. The application documentation comprises thousands of pages of technical material, and the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources to support their case.

Moreover, GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected have a realistic opportunity to engage in decisions of such magnitude. The conditions under which the affected communities have been expected to respond fall short of this standard. Therefore, Ministers are urged to bear these shortcomings firmly in mind when weighing the representations made. The inadequacies in both timing and accessibility of consultation undermine the legitimacy of the site-selection process and the broader decision-making framework.

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application’s dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.869 Effects on Local Area

There is significant uncertainty surrounding the applicant’s assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The development area lies immediately north-west of Islay and west of Colonsay, yet the

application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay's own coastline—is central to the applicant's derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it nonetheless underestimates their scale and significance, particularly when compared to the mitigation measures proposed. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, producing an effect described as Moderate and Significant. Despite this, the proposed mitigation does not adequately address the pervasive visual intrusion experienced from key locations, including the ferry crossing between Fionnphort and Iona, which forms a vital arrival point and is integral to the island's sense of place.

The West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. However, the evaluation falls short in capturing the full cultural and heritage significance of Iona's monastic landscape, which includes the Abbey, the Nunnery and the high crosses. This heritage is of international importance, with its significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet notably, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impact on this internationally important heritage setting.

Furthermore, the social impact assessment appears incomplete, particularly in relation to the community on Iona itself. A household consultation revealed that 92 per cent of respondents object to the proposal, reflecting widespread local concern. The applicant's own consultants identify habitability as a potential pathway of effect on this community, yet this important consideration was never fully assessed. To contextualise the scale of the visual impact, the largest turbines would surpass the height of Ben Hynish on Tiree, a well-known landmark standing at 141 metres and

visible from Iona at approximately 33 kilometres; the turbines would be approximately 194 metres tall and at roughly two-thirds of that distance. This comparison underscores the considerable and underappreciated magnitude of the proposed development's visual presence, which is likely to exacerbate the adverse effects on both the community and the heritage value of Iona.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, yet these evaluations appear to underestimate or omit significant impacts, particularly on vulnerable island communities and their natural and cultural qualities. Ulva, a community-owned island within this National Scenic Area, is at an early stage of regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva's community or landscape qualities has been provided, leaving a critical gap in understanding the full implications.

Staffa, situated within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the applicant's own assessment boundary, which extends to around 30 kilometres as advised by NatureScot for evaluating effects on National Scenic Area qualities. Despite recognising Staffa's panoramic

maritime qualities, the applicant concludes that changes there would be small and not significant, a position that does not fully account for the island's cultural and environmental importance.

Beyond these, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed with high sensitivity but assigned only medium to low magnitude of impact. This moderation is justified primarily by distance, apparent scale, and retention of landforms, notwithstanding that the area's designation is fundamentally based on its wild, undeveloped Atlantic outlook. Similarly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of approximately 35 to 40 kilometres, receive comparable treatment with limited recognition of potential adverse effects.

Collectively, these considerations indicate that the applicant's assessment does not fully capture the scale or significance of effects on wider seaboard designated landscapes and island communities. The omission of detailed evaluation for Ulva, the constrained assessment boundary excluding Staffa's full context, and the underestimation of impacts on other National Scenic Areas undermine the protection afforded to their natural and cultural qualities. Consequently, the assessment fails to provide a comprehensive understanding necessary to safeguard these sensitive landscapes and communities.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic, making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island's natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree's sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development area. For instance, the community-owned island of Gigha, celebrated nationally for its regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula, yet these important seaward panoramas are subject only to the distance-based moderation critiqued here. Moreover, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura and surrounding waters, alongside the Treshnish Isles and nearby mainland coasts, share this unassessed vulnerability. Consequently, the applicant's approach compromises the comprehensiveness of the

assessment by omitting these key receptors, undermining confidence in its conclusions.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of the true impacts experienced by these receptors, as the assessment consistently moderates effects based solely on distance rather than on site-specific sensitivity or context.

This method fails to provide any place-based assessment for the communities living beyond this 20-kilometre threshold, despite the fact that these communities are demonstrably affected. By applying a blanket discounting of effects at this distance, the assessment overlooks meaningful environmental and social consequences, thereby undermining the integrity and comprehensiveness of the environmental evaluation process.

In conclusion, the reliance on a distance-based moderation and discounting framework leads to a significant gap in the assessment's scope and accuracy. To ensure a robust and credible environmental impact assessment, it is essential that effects on sensitive receptors beyond 20 kilometres are fully recognised and appropriately evaluated, rather than systematically diminished or ignored.

1.1.870 Personal Observations

In addition to the planning matters above, I am personally concerned because: I come from Portnahaven on the Island of Islay. My family have lived there for generations, making a living from land and sea.I was horrified by the plans for this array. I believe that the visual impact on our beautiful villages will be huge. Portnahaven and Portwemyss rely heavily on tourism. Beyond the attraction of the whitewashed fishermen's cottages, the famous Stevenson designed lighthouse (that the villages last year celebrated its bicentenary) with the ruins of an ancient chapel in the grounds, the Fishermen's Path made by the local people to enable tourists to enjoy the stunning views of Orsay and MacKenzie islands and even the Irish coast seen on a clear day. An array of the proposed proportions would severely impact these iconic sites and views that my and many local families have enjoyed for generations and hoped would remain unspoiled for future families.

Based on my own local knowledge, I also wish to highlight that: À tidal array on the scale planned would not just fit in seamlessly. The whole environment would be adversely
affected and impacted. The iconic and in some cases
endangered species of wildlife such as the sea eagle and the chough whose breeding grounds are very close to the planned array could end up either not breeding future numbers or be scared off completely by the impact of the excavations. These are SA and SSSI designated areas and should never be considered for a tidal array.

excavation and construction process which is bound to have a huge effect on the ocean floor. This will affect basking sharks, dolphins and our local iconic seals, whose antics are much photographed and filmed by visitors to the villages.

Finally, I would also ask the Scottish Ministers to consider: I would urge Scottish Ministers to rethink this planned ruination of the beautiful costs of our precious islands. There would be no benefit as in lower power costs because the national grid has insufficient capacity to cope with excess power and indeed many turbines are regularly turned off because of over production. The only people benefiting from this eco
vandalism are the power
companies who benefit hugely from our obsession with Net Zero and to destroy this area for such scant benefit to the local community is just unconscionable.

1.1.871 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and cultural heritage of the area. However, published reviews of the applicant's documents reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While the impacts on island communities have been identified, they remain unassessed. Additionally, the ecological criteria stipulated have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently under consideration by the Scottish Ministers.

Given these shortcomings, it is urged that consent for the MachairWind Offshore Wind Farm be refused, along with the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, it is recommended that the determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also sought that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 189
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application numbers 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These submissions, lodged by MachairWind Limited (ScottishPower Renewables), concern the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The project envisions installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres of marine environment northwest of Islay and west of Colonsay. Notably, the site lies about 21 kilometres from Iona and is proximate to various islands and coastal settlements in the southern Hebrides.

The following exposition outlines my objection grounded in planning and environmental considerations, framed within the statutory and policy parameters applicable to these applications. It is essential to emphasise that the onus lies firmly on the applicant to establish, through robust and sufficient evidence, that all relevant statutory tests and policy requirements are met. Objectors bear no obligation to demonstrate the contrary. Upon careful scrutiny, the evidence submitted fails to satisfy these statutory thresholds, thereby justifying refusal of consent. I request that this objection be formally registered and that I be kept informed of the determination of these applications.

1.1.872 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Crucially, the applicant must also take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not establish that such reasonable mitigation measures have been identified or committed to, thereby falling short of the statutory requirement. This absence of demonstrated mitigation undermines the applicant’s compliance with the legal framework and fails to satisfy the necessary standard of care expected under Schedule 9.

Furthermore, the Scottish Ministers, in their determination of the application, are required to have regard to the same statutory duties. The evidence explicitly states that where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these matters weigh against the granting of consent. Given the clear deficiencies and omissions in addressing the statutory duties under Schedule 9, the application cannot be considered to meet the legal threshold for approval. The failure to properly address these statutory obligations constitutes a significant procedural and substantive defect that must result in the refusal of consent.

The marine licence application is required to be determined under Part 4 of the Marine (Scotland) Act 2010, with authorisation decisions made in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan sets out General Policies that are particularly pertinent to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. Compliance with these policies is an integral part of the statutory assessment process for the marine licence application.

However, the application fails to demonstrate compliance with these statutory requirements and relevant National Marine Plan policies. The evidence identifies deficiencies and omissions in the submission that undermine the statutory assessment. In particular, the application does not adequately address the requirements of GEN 19 regarding the provision of sound evidence, nor does it sufficiently consider cumulative impacts as required by GEN 21. Furthermore, there is a lack of clear engagement as mandated by GEN 18, and the application does not satisfactorily account for potential effects on the historic environment, landscape, and natural heritage as set out in GEN 6, GEN 7, and GEN 9. These shortcomings represent significant conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the failure to demonstrate compliance with the National Marine Plan policies, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established by the evidence, where compliance has not been demonstrated or where conflicts with the legal and policy framework exist, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the statutory requirements or the relevant policies of the National Marine Plan.

The proposal under consideration fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside the relevant statutory duties and legislative requirements. The applicant has not provided sufficient evidence to show that the development meets the standards and protections required by these policies.

Policy 3 (Biodiversity) requires that developments avoid adverse impacts on biodiversity and, where possible, enhance it. The application lacks adequate assessment and mitigation measures to ensure that biodiversity is protected or improved. Similarly, Policy 4 (Natural Places) mandates the safeguarding of natural environments and landscapes. The proposal does not convincingly demonstrate that it will preserve or enhance natural places, nor does it address potential harm to these areas in a manner consistent with the policy's requirements.

Policy 7 (Historic Assets and Places) obliges applicants to protect and conserve historic assets and their settings. The submitted documentation fails to provide a

comprehensive evaluation of the impact on historic assets, nor does it propose sufficient measures to mitigate any harm. This omission conflicts with the statutory duties to preserve heritage assets and their significance.

Policy 11 (Energy) sets out expectations for energy use and sustainability in developments. The proposal does not adequately address these requirements, lacking clear evidence of compliance with energy efficiency standards or renewable energy integration as mandated by the policy.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh against the granting of consent. In this case, the absence of demonstrated compliance and the presence of significant evidential shortcomings in relation to biodiversity, natural places, historic assets, and energy policies of NPF4 constitute clear grounds for objection to the proposal.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. The submitted documentation does not adequately demonstrate that these environmental impact assessments have been properly conducted or reported, resulting in a fundamental procedural deficiency. This omission undermines the decision-making process by leaving the determining authority without the necessary evidence to evaluate the full environmental consequences of the proposal, contrary to the explicit legal requirements.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a comprehensive Habitats Regulations Assessment means that the potential impacts on protected habitats and species have not been properly considered or mitigated. Given that compliance with these statutory tests has not been demonstrated, and that the evidence reveals clear deficiencies and omissions in meeting the legal and policy framework, these failures weigh decisively against the granting of consent for the development.

The applicant’s submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework is clear in mandating that any proposal affecting island communities must demonstrate compliance by thoroughly addressing and integrating those interests into the planning assessment.

However, the evidence before the determining authority reveals that this proposal fails to demonstrate such compliance. There are notable deficiencies and omissions in the consideration of island community interests, with no substantive evaluation or weighting of these factors apparent in the application documentation. This lack of proper assessment constitutes a failure to meet the statutory obligations set out in the Islands (Scotland) Act 2018.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and the evidence identifies clear shortcomings in addressing the interests of island communities, these matters must weigh against the granting of planning consent. The proposal's failure to properly consider and give due weight to island community interests is a material planning concern that should result in refusal.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. The evidential burden lies squarely with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. This obligation is not met by mere assertions but demands clear and comprehensive proof.

In this case, the applicant has failed to discharge this burden adequately. The submitted evidence does not conclusively establish that all statutory duties have been observed, nor does it confirm full adherence to the relevant planning policies and environmental assessment obligations. Where the evidence is deficient, incomplete, or reveals conflicts with the legal and policy framework, these shortcomings must be given decisive weight against the proposal.

Given the absence of demonstrable compliance, the application cannot be considered to meet the necessary legal and policy standards. The unresolved deficiencies and omissions in the evidence undermine the legitimacy of the proposal and weigh firmly against the granting of consent. It is therefore incumbent on the determining authority to refuse permission on the basis that the applicant has not satisfied the essential evidential requirements to justify approval.

1.1.873 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development; however, such support is conditional upon compliance with the policy's impact criteria. Specifically, Policy 11(c) requires consideration of impacts on communities, while Policies 11(d) and 11(e) address the effects on landscape, seascape, and other receptors. The proposal under consideration fails to satisfy these requirements, thereby undermining the policy's intended support framework.

As detailed in subsequent analyses, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. There is insufficient evidence to demonstrate protection of the cultural significance of scheduled monuments and their settings. Furthermore, the proposal does not adequately safeguard island communities, nor does it convincingly meet the necessary ecological tests. Collectively, these shortcomings amount to a conflict with the impact criteria set out in NPF4 Policy 11, calling into question the proposal's compliance and justification under the policy.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies that safeguard nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences for these designated

assets. Specifically, Policy 11 must be read alongside Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities; Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the setting of historic assets; and Policy 3 on biodiversity. The evidence clearly demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas are protected. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the proposal fails to satisfy the ecological tests required by Policy 3, as the submitted evidence does not demonstrate that these tests can be met. In conclusion, the proposal is in conflict with key NPF4 policies intended to protect designated assets, and as such, should not be supported.

The practical consequence of the proposed development is its adverse impact on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These elements are fundamental to the character and identity of the area, and the proposal's effects on land-based receptors directly undermine the protections established within the terrestrial development plan framework.

This conflict with the Local Development Plan 2 means that the proposal fails to align with the policies designed to preserve the natural and cultural environment. The planning framework's purpose is to ensure that development contributes positively to the local area, yet in this case, the scheme would detract from key environmental and social values, contravening the intended outcomes of the adopted plan.

Furthermore, the proposal is inconsistent not only with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise. Consequently, the proposal should be regarded as contrary to the relevant development plan policies and national planning objectives, which weigh decisively against its approval.

1.1.874 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease. Nevertheless, analysis of the applicant's Chapter 16 and Appendices 16.1 to 16.3 reveals a clear pattern: no highly sensitive receptor situated more than approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This indicates a de facto limitation embedded within the assessment, constraining the recognition of significant impacts to receptors within this 20-kilometre radius.

Further scrutiny of the applicant's own documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area located over 30 kilometres from the development is judged to experience only a small scale of change due to viewing distance. Similarly, the Landscape Character synthesis

categorises impact magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude precisely at distances where the most sensitive designated landscapes are found results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent limitation means that the visualisations may underrepresent certain perceptual effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

Beyond the temporal scope of the 35 years, it is also crucial to acknowledge that policy considerations do not treat this operational life as a limit on harm. The decision to grant consent for this development effectively constitutes a determination that the seascape is suitable for wind farm use, accepting the associated changes to

its character. Therefore, even if mitigation could reduce some adverse effects, the permanent introduction of lighting remains a key factor in altering the night-time environment. In conclusion, the unavoidable lighting effects represent a material and lasting impact on the seascape character that must be carefully weighed in the planning balance.

When assessing the proposal against relevant planning policies safeguarding landscape and seascape interests, it is important to consider the extent to which mitigation measures have been applied and their effectiveness. The applicant's submission fails to demonstrate that the scale of the acknowledged effects has been properly evaluated in accordance with its own methodology. Without clear evidence of effective mitigation, the proposal remains inconsistent with the requirements set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to ensure that development minimises adverse impacts on nationally important landscapes and seascapes, and any deficiencies in mitigation undermine the justification for the project.

Furthermore, the applicant has not provided sufficient evidence to prove compliance with the policies designed to protect these valued environments. The absence of robust assessment and appropriate mitigation strategies means the proposal does not meet the established policy tests. Consequently, the application falls short of the standards required to safeguard the special qualities of the landscape and seascape, and as such, should not be supported in its current form.

1.1.875 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

The practical consequence of the applicant's current approach is that the full cultural significance of the affected heritage assets may not be adequately understood or protected. The baseline information provided acknowledges that this significance is deeply rooted in experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These attributes emphasise the dynamic relationships between monuments, spirituality, and their surrounding landscape and seascape, which are experienced in motion rather than from static viewpoints. If the assessment fails to capture these broader cultural and experiential dimensions, it risks underestimating the true impact of the proposed development on heritage values.

Further reinforcing this concern, Historic Environment Scotland's consultation responses—recorded within the application itself—have specifically requested additional viewpoints to ensure these wider qualities are properly represented in the assessment. This highlights a recognised need for a more comprehensive evaluation that accounts for the intangible and interconnected aspects of the heritage assets. Without addressing this, the applicant's assessment may not meet the necessary standards for understanding and mitigating harm to the cultural landscape, potentially leading to adverse effects that are insufficiently identified or managed. It is therefore essential that these broader experiential qualities form an integral part of any heritage impact appraisal.

The mitigation measures proposed rely heavily on the findings of the landscape assessment; however, this dependence raises concerns given the identified understatement of landscape effects. The heritage impact conclusions are intrinsically linked to the landscape assessment's outcomes, and as such, any minimisation of landscape impacts directly influences the perceived significance of heritage effects. Specifically, the heritage conclusions inherit the same degree of understatement present in the landscape assessment, thereby undermining their overall credibility. This interconnected reliance suggests that a more robust and comprehensive landscape evaluation is essential to underpin reliable heritage impact assessments. Without addressing these deficiencies, the conclusions drawn regarding heritage effects lack a sound evidential basis and should be treated with caution.

The practical consequence of the current application is that it fails to provide the necessary assurance that important heritage assets will be adequately protected. This shortcoming directly undermines the proposal's acceptability, as the applicant has not supplied the required evidence to demonstrate that the cultural significance of heritage assets of international and national importance, as well as their settings,

will be preserved. Without such demonstration, decision-makers cannot confidently conclude that the development complies with relevant heritage protection policies.

This deficiency engages a number of critical policy provisions. Specifically, the proposal falls short of the requirements set out in NPF4 Policy 7(h), which relates to scheduled monuments, and Policies 7(c) and 7(d), which concern the setting of heritage assets. In addition, it contravenes GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies and guidance collectively demand robust assessment and clear evidence that development will not harm the integrity or significance of designated heritage sites and their surroundings.

Given the absence of a comprehensive assessment and the failure to demonstrate compliance with these key policies, the Scottish Ministers do not have before them the necessary information to approve the application. The lack of evidence to protect heritage assets represents a fundamental policy conflict that cannot be overlooked. Consequently, the application should be refused on the grounds of insufficient heritage protection, in line with the established statutory and policy framework.

1.1.876 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

The applicant's failure to assess habitability impacts on island communities undermines the reliability of their socio-economic conclusions and risks overlooking significant adverse effects. Their own consultants acknowledged habitability as a potentially significant pathway of impact, yet no specific assessment was undertaken for the affected islands. Instead, the socio-economic evaluation in Chapter 18 is conducted at a regional scale, focusing on port communities while neglecting a place-based analysis of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding unsupported by targeted evidence.

Island economies are distinct from regional averages; they rely heavily on sectors directly tied to the qualities that attract visitors. This economic concentration heightens their vulnerability rather than mitigating it, as dependence on increasing

visitor numbers intensifies sensitivity to changes in those visitor-attracting attributes. Therefore, concluding low sensitivity without a detailed, place-specific assessment is not a substantiated finding but rather an unproven assumption. This methodological flaw renders the socio-economic assessment inadequate for understanding or mitigating the proposal's impacts on island communities.

The proposal fails to comply with the relevant planning policies and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be founded on robust socio-economic evidence and apply a precautionary approach when such evidence is insufficient. Furthermore, it contravenes NPF4 Policy 11(c) and the obligations under the Islands (Scotland) Act 2018, all of which require that the interests of island communities be properly assessed and given due weight through meaningful engagement from the outset to the conclusion of the planning process. The applicant acknowledged that island communities warrant particular consideration but failed to undertake the necessary assessments to understand the potential effects on them. Consequently, the proposal has not demonstrated compatibility with the sustainability of island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. In light of these deficiencies, the proposal does not meet the required planning and statutory standards and should therefore be refused.

1.1.877 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the full extent of ecological impacts arising from the proposed development within this sensitive marine environment. The area in question encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological importance. Moreover, the surrounding waters provide habitat for a range of protected species including seabirds, marine mammals and basking sharks.

The scale of the proposal is significant, with construction, operation and eventual decommissioning activities projected to take place over several decades. Introducing such sustained and large-scale human activity into an environment of high ecological sensitivity raises concerns about potential adverse effects, which have yet to be satisfactorily addressed. The cumulative and long-term consequences on the integrity of the Priority Marine Features and associated species warrant thorough scrutiny.

Given the recognised environmental value of the site and the scale of the proposed works, careful consideration must be given to the potential for significant harm. It is essential that any planning decision fully accounts for the ecological sensitivities and ensures that adequate measures are in place to avoid or mitigate adverse impacts throughout the lifetime of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically aimed at addressing potential impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of the protected site cannot

be conclusively ruled out. Their inclusion in the application is therefore a significant matter, reflecting the applicant’s recognition of the sensitivity of the site and the potential for environmental harm.

Notably, the submission of these documents indicates that the applicant acknowledges the possibility that the Scottish Ministers may reach a different conclusion regarding the likelihood of adverse effects on the protected site’s integrity. By proactively providing derogation and compensation proposals, the applicant intends to address such concerns should they arise during the determination process. This approach demonstrates a degree of responsibility in seeking to mitigate potential impacts on a designated conservation area, although it also underscores the inherent uncertainties associated with the assessment of such effects.

In practice, this means that any development proposal affecting protected habitats or species must meet an exceptionally high evidential threshold before consent can be granted. The competent authority is legally required to ensure that the proposal will not adversely affect the integrity of the protected site, and this must be established beyond reasonable scientific doubt. It is not sufficient for applicants simply to propose mitigation, compensation, or future monitoring measures; these alone do not satisfy the statutory tests under the Habitats Regulations.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these regulations and policies establish a stringent consent regime that places the burden of proof firmly on the applicant to demonstrate compliance. Consequently, decision-makers must be satisfied on robust scientific grounds before any approval is considered.

The practical consequence of the applicant’s failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed, as it does not adequately safeguard internationally important ecological features. A detailed review of the submitted evidence, including the applicant’s own derogation documents, reveals a lack of sufficient certainty that the legal protections for habitats and species of international significance will be upheld. This shortfall undermines the applicant’s case for granting consent, as the statutory requirements designed to prevent adverse impacts on these protected features remain unmet. Consequently, the application fails to satisfy the necessary legal standards, and consent should be withheld accordingly.

1.1.878 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it fails to evaluate the project in its entirety, contrary to established legal principles. Only a portion of the development is presently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the wind farm’s operation, yet their environmental and cumulative effects are excluded from the principal decision-making process. This segmentation results in a fragmented evaluation, preventing a comprehensive understanding of the project's overall impact. Such an approach

conflicts with the principle upheld in Raeshaw Farms, where the courts emphasised that projects must be assessed holistically rather than divided into smaller parts whose individual impacts might appear less significant. Consequently, the current methodology undermines the integrity of the assessment and should be reconsidered to ensure a complete and lawful evaluation of all project elements.

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposal, alongside other existing, consented, and foreseeable developments, are underestimated. This arises because these cumulative assessments depend directly on conclusions drawn in other parts of the Environmental Impact Assessment. If the baseline assessments for landscape, heritage, and socio-economic factors are understated, as previously outlined, then the cumulative assessment is inherently flawed by starting from this diminished baseline. As a result, the overall impact is not fully captured, calling into question the reliability of the cumulative impact conclusions.

The applicant's submission fails to comply with GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Specifically, the applicant has not demonstrated that the cumulative and in-combination effects of the proposal, nor the effects of the project as a whole, have been reliably identified and assessed. This omission raises significant concerns regarding the adequacy of environmental assessment. It is therefore requested that the decision-making process explicitly addresses the treatment of the deferred works to ensure full compliance with the relevant policies and regulatory requirements.

1.1.879 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that Ministers bear these factors firmly in mind when considering the representations made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application's dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.880 Effects on Local Area

There is significant uncertainty regarding the applicant's assessment of the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Notably, Islay and Colonsay are the closest inhabited islands to the proposed development area, which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay. However, the application approaches Islay primarily as a potential project location rather than as an affected island community in its own right. This perspective results in an absence of any place-based evaluation of how the development might impact Islay's Atlantic-facing communities, their setting, economy, or community life, thereby undermining the reliability of the environmental and heritage impact appraisal.

For Colonsay and Oronsay, the situation is no less concerning. The seaward outlook, which profoundly shapes daily life on these islands, directly faces the proposed array. Of particular importance is the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline. This site is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be ruled out. Such an admission highlights the potential for significant and irreversible environmental effects, yet the wider implications for the community and natural heritage appear insufficiently addressed.

Moreover, Oronsay Priory, a scheduled monument of national importance, is situated within this same community area. The concerns previously identified regarding gaps in the heritage assessment apply equally to the evaluation of the Priory's open

maritime setting. The failure to adequately consider the impact on this nationally significant heritage asset further calls into question the thoroughness and robustness of the applicant's environmental and heritage impact evaluation. Taken together, these points indicate that the assessment underestimates the magnitude and significance of effects on these island communities, thus raising serious doubts about the overall reliability of the application's conclusions.

While some mitigation measures have been proposed, they do not adequately address the significant and underestimated impacts on Iona. The Coastal Character assessment recognises the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility spanning approximately 21 kilometres. The turbines would extend across about 39 degrees of the horizon, resulting in a moderate and significant overall effect that is unlikely to be fully mitigated. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì. Furthermore, Iona's internationally important monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—is closely tied to pilgrimage and arrival by sea. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of heritage impacts. Community concerns reinforce these findings; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, and notably, the applicant's own consultants identified habitability as a potential pathway of effect for this community, which remains unassessed. To contextualise the scale of the visual impact, the turbines' height would surpass that of Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment understates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, and attributes these effects a Medium magnitude. Specifically, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and primary embarkation point for visitors. This community is most directly connected to the flow of visitors, underscoring the importance of thorough evaluation. Similarly, significant effects are recognised on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed throughout as of High sensitivity at distances of approximately 21 to 33 kilometres, yet the applicant attributes no greater than a Medium magnitude of effect.

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and

community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

The applicant's assessment of the impacts on designated landscapes and island communities appears to underestimate the significance of effects on key areas, particularly when compared to the mitigating considerations they present. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is intrinsically linked to the preservation of its unspoilt seascape and setting—qualities central to the designated landscape and yet entirely absent from the assessment. Despite this, the applicant has made no evaluation of the potential effects on Ulva's natural and cultural environment, thus neglecting a vital element of landscape and community protection. Similarly, Staffa, also within the same National Scenic Area and recognised as one of Europe's most celebrated small islands, lies roughly 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres within which NatureScot requested that effects on National Scenic Area qualities be assessed. While the applicant concedes that Staffa possesses panoramic maritime qualities, they conclude that the scale of change would be small and the effect not significant—an assessment that appears inconsistent with the acknowledged value of Staffa's landscape attributes.

A comparable approach is taken with other designated landscapes such as the Jura National Scenic Area, located about 28 to 32 kilometres from the development site. Here, the applicant rates the area as having High sensitivity but assigns only Medium to Low magnitude of effect, justifying this by citing distance, apparent scale, and retained landforms. This reasoning is at odds with the foundational basis of Jura's designation, which emphasises its wild and undeveloped Atlantic character—an attribute likely to be compromised by even moderate alterations. The Scarba, Lunga and Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment. In all these cases, the applicant's conclusions appear to downplay the potential for significant adverse effects on the qualities that underpin these designated landscapes and their associated communities. Such underestimation risks undermining the protection intended for these sensitive environments and the vulnerable island populations that depend upon them.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising it as a receptor of High sensitivity at a distance of approximately 35 kilometres. This characterization is inconsistent with the exceptional sensitivity of Tiree's landscape, which is notably defined by its low-lying topography and expansive seascape. When compared to other locations where vertical structures have been introduced, the assessment's mitigation considerations appear insufficient to justify such a modest magnitude of change in this context.

Tiree’s distinctive landscape character is fundamentally shaped by the dominance of sea and sky, with its highest elevation at Ben Hynish reaching only 141 metres. The introduction of turbines up to 335 metres in height represents vertical elements unprecedented within this open oceanic horizon. This scale of intervention would significantly alter the visual and experiential qualities of the island’s seascape. Accordingly, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor markedly understates the effects and results in an unreliable evaluation of impacts on Tiree’s landscape character.

The applicant’s assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. Notably, Gigha, a community-owned island renowned as a national symbol of island regeneration following its purchase by residents, faces the development from the east; yet, the impacts on its delicate community balance and economy remain unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant’s distance-based moderation approach is incorrectly applied, thereby undermining an accurate assessment. Furthermore, the chain of communities along the west coast of Kintyre derives its character and visitor economy from the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts overlooking the development area share this position of sensitivity. In neglecting these viewpoints and their associated economic and community significance, the applicant’s assessment lacks the necessary comprehensiveness and fails to address key receptors integral to the seascape’s social and economic fabric.

There remains a fundamental uncertainty in the applicant’s environmental impact assessment arising from its reliance on a distance-based methodology that systematically moderates and discounts effects beyond approximately 20 kilometres. This approach inherently assumes that sensitive receptors located at greater distances experience diminished impacts, yet this presumption is not substantiated by a place-specific analysis. Consequently, the assessment fails to adequately capture the true magnitude of change affecting these distant but highly sensitive communities.

Taken together, the evidence demonstrates a single proposition: wherever the applicant’s assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is moderated and the effect discounted, while the communities that live with those effects have received no place-based assessment at all. This systematic underestimation undermines the integrity of the environmental impact assessment and calls into question the robustness of its conclusions. In light of this, it is essential that the assessment be revisited to ensure that all significant effects, regardless of distance, are properly identified and evaluated.

1.1.881 Personal Observations

In addition to the planning matters above, I am personally concerned because: The areas around the west coast of Scotland and Isles should not have to be affected in any way, communities, sea life , heritage etc by the installation of something of this magnitude

Based on my own local knowledge, I also wish to highlight that: All will be affected

Finally, I would also ask the Scottish Ministers to consider: This should not just be a box ticking exercise for “green” energy!!!

1.1.882 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant’s documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 190
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in applications 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both filed by MachairWind Limited (ScottishPower Renewables). I request that this communication be recorded as an official objection, that my status as an objector be formally recognised, and that I receive notification of the final determination regarding these applications.

The proposals seek approval for the construction and operation of an offshore wind facility with a generating capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning some 448 square kilometres. The designated site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the southern Hebrides' islands and coastal communities.

In accordance with the statutory and policy framework governing these applications, the subsequent sections outline the planning and environmental grounds on which my objection is based. It is important to emphasise that the evidential burden lies entirely with the applicant, who must substantiate that all relevant statutory tests and policy criteria are satisfied. Objectors such as myself bear no obligation to disprove the application. On the basis of the analysis presented below, it is clear that the applicant has failed to meet this burden. Consequently, I maintain that the applications should be refused.

1.1.883 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluations acknowledge significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, while the effects on the island communities directly affected were identified but never subject to proper evaluation. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for approval.

Given these substantial shortcomings, I urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm and the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of additional environmental information and enhanced visualisations to address the deficiencies identified. Moreover, I propose that the applications be determined only following a public inquiry, which would allow for thorough examination of the issues raised in this objection.

Finally, irrespective of the decision reached, I ask the Ministers to provide clear and explicit conclusions in their reasons regarding the effects on cultural heritage and the impacted island communities. This transparency is essential to ensure that these critical considerations are properly acknowledged in the final determination.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 191
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed within application numbers 00012385 and 00012386, which seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that my objection be formally recorded and that I receive notification upon determination of these applications.

The development in question involves the construction of an offshore wind farm with a capacity of approximately 2 gigawatts. The project proposes installing between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This installation would occupy a Windfarm Development Area spanning approximately 448 square kilometres of sea, situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. The site lies in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in planning and environmental considerations, which I will outline with reference to the statutory and policy framework applicable to these proposals. It is incumbent upon the applicant to satisfy the relevant legal and policy tests through comprehensive evidence. The onus does not fall on objectors to disprove the proposals. In this instance, the applicant has failed to meet that evidential burden. Consequently, I submit that the applications should be refused consent.

1.1.884 Legislative and Policy Framework

The applicant’s submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests.

The evidence before the determining authority demonstrates that compliance with these legal requirements has not been established. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment provided. The absence of adequate and complete assessments means that the statutory tests have not been met, and the potential significant environmental effects remain unquantified and unaddressed.

Given these failures to provide the necessary and legally mandated environmental information and assessments, the proposal conflicts with the applicable legal and policy framework. As such, these shortcomings must weigh decisively against the granting of consent for the development.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a significant procedural deficiency. This statutory requirement obliges decision-makers to explicitly address and give due weight to the unique circumstances and needs of island communities during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal obligations set out in the Act.

Furthermore, the evidence identifies clear omissions and deficiencies in the proposal's assessment regarding island communities, which conflict with the applicable legal and policy framework. Where such failures occur, established guidance confirms that these matters must weigh against the granting of consent. In this case, the lack of adequate consideration of island community interests constitutes a material failure that should result in refusal of the application.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It is an established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence does not meet this evidential burden.

Specifically, the application lacks sufficient demonstration that all statutory duties have been addressed, and there are clear deficiencies and omissions within the supporting documentation. These shortcomings result in unresolved conflicts with the applicable legal and policy framework. Such failures are material and significant, as the absence of conclusive evidence confirming compliance undermines the legitimacy of the application.

Given these evidential deficiencies and the applicant's failure to meet the required standard of proof, the proposal cannot be considered compliant with the statutory and policy framework governing the development. Consequently, these unresolved matters must weigh decisively against the granting of planning consent.

1.1.885 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan policies. Specifically, the Argyll and Bute Local Development Plan 2 is directly relevant to land-based impacts, and the proposal conflicts with its protective provisions. This incompatibility undermines the plan's role in guiding sustainable development within the area.

In addition to the development plan conflict, the proposal fails to align with the overarching objectives of the National Planning Framework 4 when considered in its entirety. Despite this comprehensive policy framework, the applicant has not provided sufficient evidence or justification to demonstrate that the proposal would avoid or mitigate the identified adverse effects. This lack of demonstration reinforces the position that the development is inconsistent with established planning policies.

Given these considerations, the proposal should be regarded as contrary to the relevant terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, and to national planning policy as set out in the National Planning Framework 4. The absence of adequate mitigation or policy compliance weighs decisively against the proposal's acceptability.

1.1.886 Seascape, Landscape and Visual Effects

While mitigation measures aim to reduce visual impacts, it is important to recognise that the visualisation materials underpinning the assessment have inherent limitations that constrain their effectiveness. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully convey the scale perceived by a viewer in situ. Furthermore, the wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings dependent on the photographic base rather than serving as independent corrections. Consequently, reliance on these visualisations may underestimate the true visual effects experienced on site.

When considering the potential impacts of the proposed development on the night-time seascape character, it is important to weigh the nature and permanence of the changes introduced by the aviation and navigation lighting. Unlike other forms of mitigation that may seek to reduce visual intrusion through landscaping or design adjustments, lighting effects in this context represent a novel and enduring alteration to a currently unlit sea horizon. This distinct characteristic means that traditional mitigation measures offer limited scope in addressing the fundamental change to the seascape's night-time appearance.

The development would introduce permanent lighting for the entire stated 35-year operational life, marking a substantial departure from the existing natural darkness of the seascape. This continuous illumination would alter the character of the night-time environment in a way that is both visible and appreciable to those experiencing the seascape, effectively creating a new visual element that did not previously exist. The significance of this impact must be carefully balanced against the benefits of the development, recognising that the presence of such lighting is integral to the scheme's operation and safety requirements.

Moreover, the duration of the development's operational life does not mitigate the policy implications of this change. A decision to consent to the development inherently signifies a judgment that this particular seascape is appropriate for wind farm use, including the acceptance of the associated lighting effects. Thus, the harm to the night-time seascape character is not simply a temporary inconvenience but a defining factor in the long-term suitability of the site. This consideration must be central to the planning decision, ensuring that the balance between development objectives and seascape preservation is properly maintained.

The proposal fails to comply with the requirements set out in key planning policies designed to safeguard nationally important landscape and seascape interests. Specifically, the identified effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the

National Marine Plan. These policies collectively establish a clear framework for the protection and sustainable management of such sensitive environments.

Despite this policy context, the applicant has not convincingly demonstrated that its conclusions regarding the scale of the accepted effects align with its own stated methodology. This gap undermines confidence in the assessment's reliability and casts doubt on the extent to which the proposal respects the integrity of the protected landscapes and seascapes. Without robust evidence to show adherence to the relevant policy criteria, the proposal cannot be regarded as compliant.

In light of these findings, it is concluded that the proposal does not meet the necessary policy standards for safeguarding nationally important landscape and seascape assets. Consequently, it should not be supported in its current form, as it fails to demonstrate the essential compliance required by the pertinent planning policies.

1.1.887 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment identifies the cultural significance of the heritage assets as deriving from a complex interplay of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is further characterised by the relationships between monuments, spirituality, and the surrounding landscape and seascape, with these elements experienced dynamically through movement rather than from static viewpoints. Such a nuanced understanding underscores the importance of considering the broader cultural landscape and experiential qualities when assessing potential heritage impacts.

However, Historic Environment Scotland's consultation responses, as recorded in the application, highlight that the current assessment may not adequately capture these wider qualities. Their request for additional viewpoints reflects a concern that the full extent of the cultural significance might be underrepresented, potentially leading to an incomplete evaluation of the heritage impacts. This suggests that a more comprehensive approach is necessary to ensure that the cultural landscape and its experiential dimensions are properly accounted for in the assessment process.

The practical consequence of deficiencies in the landscape assessment is a corresponding undermining of the credibility of the heritage impact conclusions. As the heritage conclusions rely directly on the findings of the landscape assessment, any understatement of landscape effects necessarily transfers to the heritage analysis. This interdependence means that if landscape effects are not fully or accurately recognised, the subsequent heritage impact conclusions will similarly underestimate the true extent of harm. Therefore, the validity of the heritage conclusions is compromised by the initial shortcomings in the landscape evaluation, calling into question the robustness of the overall impact assessment.

The application fails to provide the necessary assessment to demonstrate protection of internationally and nationally important heritage assets, as required by NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their

setting. This absence of evidence means the cultural significance of these assets and their surroundings cannot be assuredly preserved.

Furthermore, the proposal does not comply with the requirements set out in GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively underscore the importance of safeguarding heritage within planning decisions. Without a robust demonstration of how these policies are met, there remains a substantial risk of harm to heritage assets.

In light of these shortcomings, the Scottish Ministers are deprived of the critical information necessary to conclude that the development would protect heritage assets appropriately. Consequently, the application should not be approved as it does not satisfy the essential policy safeguards for heritage protection.

1.1.888 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the proposed development is a direct threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, whose presence underpins local businesses, services, and population stability. Any alteration to the qualities that draw visitors risks undermining the economic base upon which these islands depend.

The applicant’s own baseline assessments identify the key attractions for visitors as the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. These elements are not peripheral; they constitute the very essence of what makes the islands appealing and viable as destinations. Diminishing or damaging these characteristics would inevitably lead to a decline in visitor numbers, with cascading effects on employment, local services, and community cohesion.

In summary, the proposal poses a significant risk to the viability of these island communities by threatening the qualities that sustain their visitor economy. Given the exceptional dependence of these islands on tourism drawn by these unique attributes, the development should be reconsidered to avoid jeopardising the long-term social and economic health of these communities.

The practical consequence of the applicant’s flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant’s own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission, the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors.

The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

1.1.889 Ecology, Biodiversity and Habitats Regulations

While mitigation measures are proposed, they are unlikely to fully address the significant risks posed to Priority Marine Features and Annex I habitats present within the development area. The surrounding waters also support important populations of seabirds, marine mammals, and basking sharks, all of which would be exposed to disturbances from large-scale construction, operation, and decommissioning activities extending over several decades. Given the ecological sensitivity and the scale and duration of the proposed development, there is a substantial potential for significant adverse environmental effects that mitigation alone cannot adequately prevent.

The applicant's submission of both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan acknowledges the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared only when an adverse effect on the integrity of a protected site cannot be ruled out, indicating that the applicant recognises the possibility of significant impacts. Notably, the submission itself signals that the applicant's conclusion on the absence of adverse effect is not definitive, leaving open the prospect that Scottish Ministers may reach a different determination. This recognition, alongside the proposed compensation measures, reflects a cautious approach to mitigation but also underlines the unresolved nature of the potential harm to the protected site.

Consent for developments affecting protected habitats and species can only be granted where there is no reasonable scientific doubt that the integrity of the protected site will remain unaffected. Under the Habitats Regulations, the competent authority must be satisfied that the proposal will not adversely affect the site's integrity, except where strict derogation tests are conclusively met. This places a very high evidential burden on the applicant to demonstrate compliance. Importantly, measures such as mitigation, compensation proposals, or future monitoring alone do not suffice to meet the statutory tests. This stringent legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Given these requirements, any consent granted without unequivocal scientific certainty that the protected site's integrity will remain intact would be unlawful.

Therefore, proposals must be rigorously assessed against these standards before any approval is considered.

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.890 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

The cumulative impact assessment relies heavily on baseline evaluations that have already been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. Given that the foundational Environmental Impact Assessment adopts this reduced baseline, any subsequent cumulative analysis necessarily inherits these limitations. As a result, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are inherently undervalued.

This methodological flaw undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential harm. Without an accurate and robust baseline, the true scale of cumulative impacts remains obscured, leading to an incomplete understanding of the proposal's broader consequences. Consequently, the assessment cannot be considered a sound basis for informed planning decisions.

1.1.891 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, an uncertainty that fundamentally challenges the legitimacy of the applicant's case. The applicant requests that Scottish Ministers place significant weight on this process, yet the quality of public engagement throughout both the plan and site-selection stages has been demonstrably deficient. These shortcomings have persisted into the application stage itself, which is extensive and complex, comprising many thousands of pages of technical material. Crucially, the consultation period has coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is severely limited. This situation contrasts sharply with the applicant's position, having had years to prepare and substantial professional and financial resources at its disposal.

The National Marine Plan, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by decisions of this scale must be afforded a realistic opportunity to engage. Regrettably, the conditions under which affected communities have been expected to respond fall short of these established standards. This shortfall undermines the fairness and inclusiveness that are essential to legitimate decision-making processes. It is imperative that Scottish Ministers recognise this deficiency and take it fully into account when considering the representations made.

In light of these concerns, it is clear that the consultation process has not met the requisite standards for effective public participation. This failure has compromised the integrity of the site-selection process and, by extension, the application as a whole. Therefore, the weight afforded to the site-selection process should be carefully re-evaluated, with full acknowledgement of the limitations imposed on affected communities throughout the consultation period.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The

application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.892 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation underestimates the effects on local communities, economy, and heritage, thereby

undermining the credibility of the overall environmental and heritage impact assessment.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

While the applicant acknowledges significant effects on key locations such as Erraid, Fionnphort, and core paths across Mull and the Ross of Mull, their assessment falls short in adequately addressing the full extent of visual, economic, and community impacts on these sensitive coastal areas. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only a Medium magnitude of effect, despite its importance as a gateway for visitors to Iona and its direct connection to the local community reliant on tourism flows. Similarly, within Mull itself, significant effects are accepted on core recreational paths and within designated landscape areas including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is

consistently assessed as High sensitivity at distances between 21 and 33 kilometres; yet the applicant limits the magnitude of effect to Medium, thereby underrepresenting the potential for adverse impact. Furthermore, the applicant's reliance on distance-based reasoning is evident in their treatment of the Wilderness and Gribun Rocks coastal area, where a viewing distance exceeding 30 kilometres leads them to conclude that the scale of change is small, an approach that this representation challenges as insufficient given the sensitivity of the landscape. Of critical concern is the absence of place-based assessments for the western townships of Mull, whose tourism economy, wildlife boat operations, and accommodation sectors depend heavily on the unspoiled Atlantic seascape that the proposed development threatens to industrialise. This lack of detailed, community-specific consideration undermines confidence in the applicant's evaluation and fails to address the significant implications for these tourism-dependent coastal communities and designated landscapes.

The applicant's assessment of the potential effects on designated landscapes and island communities appears to underestimate the scale and significance of those effects, particularly when compared with the mitigation measures proposed. For example, while the assessment acknowledges the panoramic maritime qualities of Staffa within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant, despite the island's status as one of the most celebrated small islands in Europe and its location approximately 35 kilometres from the development area. This conclusion sits uneasily with NatureScot's guidance to assess effects up to 30 kilometres, suggesting that important visual and experiential qualities may not have been fully accounted for.

Further concerns arise in relation to Ulva, also within the Loch na Keal National Scenic Area, which supports a small, re-establishing, community-owned population whose recovery depends heavily on the unspoilt seascape and setting threatened by the development. The absence of any specific assessment of effects on Ulva undermines confidence that the unique cultural and natural qualities vital to this vulnerable community have been adequately considered. Similarly, the Jura National Scenic Area, assessed at a distance of approximately 28 to 32 kilometres, is attributed a High sensitivity due to its wild and undeveloped Atlantic outlook, yet the applicant assigns only a Medium to Low magnitude of impact, citing distance and retained landforms as mitigating factors. This approach risks undervaluing the fundamental qualities upon which the designation is based.

The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, receives an equivalent treatment, with limited recognition of potential adverse effects. Collectively, these assessments suggest a pattern of insufficient weighting given to the intrinsic wildness and cultural significance of these landscapes and island communities. To ensure the protection of their natural and cultural qualities, a more rigorous and comprehensive evaluation of impacts, including those on vulnerable island populations, is necessary. Without this, the planning balance remains uncertain, and the effectiveness of proposed mitigation measures is open to question.

The applicant's Environmental Statement assesses the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes a

Low magnitude of change to the proposed development's visual impact. This evaluation forms the basis for their overall conclusion on the effects experienced by this receptor.

However, Tiree's landscape character is exceptionally distinctive and sensitive, being an exceptionally low-lying island where the dominance of sea and sky defines its sense of place. The island's highest point, Ben Hynish, rises to only 141 metres, and the open oceanic horizon contributes fundamentally to its character. The introduction of turbines reaching heights of up to 335 metres would present vertical structures unprecedented in Tiree's seascape. Given this context, the applicant's conclusion of a Low magnitude of change significantly understates the true scale of impact on this sensitive receptor, rendering the overall assessment unreliable.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. Notably, Gigha, a community-owned island renowned as a national symbol of island regeneration following its purchase by residents, faces the development from the east; yet, the impacts on its delicate community balance and economy remain unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach is incorrectly applied, thereby undermining an accurate assessment. Furthermore, the chain of communities along the west coast of Kintyre derives its character and visitor economy from the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts overlooking the development area share this position of sensitivity. In neglecting these viewpoints and their associated economic and community significance, the applicant's assessment lacks the necessary comprehensiveness and fails to address key receptors integral to the seascape's social and economic fabric.

The applicant's reliance on a distance-based methodology that systematically moderates and discounts effects beyond approximately 20 kilometres results in a significant underestimation of impacts on highly sensitive receptors. This approach effectively diminishes the reported magnitude of change for communities located beyond this threshold, yet these communities have not been subject to any place-specific assessment. Consequently, the environmental impact assessment lacks integrity, as it fails to fully recognise or address the genuine extent and severity of effects experienced by those sensitive receptors beyond 20 kilometres. This omission undermines confidence in the assessment's conclusions and calls for a more comprehensive, place-based evaluation of impacts irrespective of distance.

1.1.893 Personal Observations

In addition to the planning matters above, I am personally concerned because: Knowing some of the local community and the issues of Island life and keeping families on the island I think this will have a negative outcome.

Based on my own local knowledge, I also wish to highlight that: Having spent time on Colonsay and Oronsay I have great concern regarding the impact on the wildlife in the area, the light and noise polution on the windfarm being so close.

Finally, I would also ask the Scottish Ministers to consider: Listen to the islanders!

1.1.894 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own documentation acknowledges significant impacts upon nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted materials reveal that these impacts have been understated, with a comprehensive heritage assessment notably absent. Moreover, while effects on the island communities impacted by the development were identified, no formal assessment of these impacts has been undertaken. The ecological criteria necessary for approval have not been demonstrated to be achievable. Additionally, it should be noted that only a portion of the project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Furthermore, it is recommended that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised within this objection. Regardless of the final decision, it is also requested that the Ministers provide explicit conclusions in their decision statement concerning the effects on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 192
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (a subsidiary of ScottishPower Renewables), relate to the construction of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The development would consist of between 91 and 144 turbines, each potentially reaching a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning about 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the southern Hebridean islands and their coastal communities.

I request that this objection be officially recorded and that I be notified of the final determination of these applications. The following sections outline the grounds for objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the onus lies squarely with the applicant to provide adequate and compelling evidence demonstrating that all relevant statutory tests and policy requirements are fully met. Objectors are not required to establish contrary proof. In this instance, the applicant has failed to discharge this burden of proof. Therefore, for the reasons detailed herein, the applications should be refused consent.

1.1.895 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the applicant’s assessment methodology, particularly in relation to distance thresholds and how they influence the evaluation of landscape effects. Notably, the applicant’s written methodology in Appendix 16.1 does not specify any distance beyond which major effects cease. However, an independent Evidence Note, drawing solely on the applicant’s Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is ever attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility.

The applicant’s own documentation further illustrates the implicit role that distance plays in moderating judgements. For example, an assessment of a coastal area more than 30 kilometres away explicitly states that, due to viewing distance, the scale of change is considered small. Additionally, the Landscape Character synthesis delineates a pattern where a High magnitude of effect is recognised within roughly 20 kilometres, Medium magnitude between about 20 and 30 kilometres, and Low magnitude beyond approximately 30 kilometres for certain landscape types. This gradation indicates a systematic reduction in assessed impact as distance increases.

The consequence of this approach is that protective tests are applied to inputs that may be understated, particularly at distances where the most sensitive designated

landscapes are situated. By moderating magnitude assessments precisely at these critical distances, the resulting conclusions risk failing to accurately represent the true effects that the Scottish Ministers are being asked to consider and consent to. This fundamental uncertainty calls into question the reliability of the assessment's predictions and the robustness of its conclusions.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations are inherently limited in their ability to convey the true scale experienced by a viewer in the field. This acknowledgement underscores that any static images, such as photographs or wireline drawings, cannot fully replicate the immersive spatial perception encountered on site. Furthermore, the wireline drawings included within the panoramic projections are not independent tools for correction but are instead technical renderings that share the same fundamental constraints as the accompanying photography.

This recognition of the limitations inherent in visual evidence is crucial for a balanced assessment of the proposal's visual impact. Given that the visualisations cannot completely replicate actual viewing conditions, their use must be carefully contextualised, with an understanding that they provide only an approximation rather than an exact representation. Therefore, conclusions drawn solely from these materials should be treated with caution, and where possible, complemented by on-site inspections or alternative evaluative methods to ensure a comprehensive appraisal.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The proposal fails to comply with essential planning policies designed to safeguard nationally important landscapes and seascapes, which has significant implications for the integrity of these protected environments. The applicant has not adequately demonstrated that the scale of the identified effects aligns with its own assessment methodology, casting doubt on the reliability of the conclusions presented.

This lack of consistency is particularly critical given the clear policy framework outlined in the National Planning Framework 4 (NPF4) and the National Marine Plan. Specifically, the proposal engages NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which establish stringent requirements for protecting landscape and seascape interests at a national level.

In light of these considerations, the proposal does not meet the necessary policy tests and should be reconsidered to ensure compliance with the statutory protections for these valued environments. Without demonstrable adherence to the relevant policies, approval would undermine established planning objectives and the long-term preservation of nationally significant landscape and seascape assets.

1.1.896 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant's Appendix 14.3 and submitted in support of community objections, identifies significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant's own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment's conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's

current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The applicant's evidence acknowledges that the heritage conclusions presented rely substantially on the findings of the landscape assessment. It is expressly recognised that any understatement of landscape effects, as previously identified, directly influences the accuracy and reliability of the heritage impact conclusions drawn from those findings. This interdependency signifies that deficiencies in the landscape assessment cannot be isolated but instead permeate the entire evaluation of heritage effects.

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and suggests that the overall assessment may not adequately reflect the true scale of harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

1.1.897 Effects on Island Communities, Tourism and the Local Economy

Mitigation measures proposed in support of the development fail to adequately address the fundamental reliance of the island communities on the qualities that attract visitors. While attempts may be made to reduce direct environmental impacts, such efforts cannot compensate for the profound alteration to the landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the islands' appeal. The applicant's own baseline assessments confirm these attributes as key visitor draws, yet the proposal would inevitably diminish them in ways that cannot be fully mitigated.

This dependence is exceptional and integral to the economic and social sustainability of the island communities. Any adverse change to these visitor-attracting qualities strikes at the very economic base of these communities, undermining not only local services and employment but also population retention and overall community viability. The proposal therefore presents a significant threat to the long-term sustainability of the islands, a risk that cannot be offset by partial mitigation measures.

In comparison to the detailed assessment of port communities, the applicant's approach to socio-economic impacts on island communities is notably insufficient. While the consultants acknowledged habitability as a potentially significant pathway for effects on island populations, no specific evaluation of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment in Chapter 18 addresses potential impacts at a regional scale, leaving the island communities—which directly face the development—without the benefit of an equivalent place-based analysis. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a position that fails to reflect the unique circumstances of the islands.

The reliance on regional averages obscures the realities of small island economies, which differ fundamentally from broader regional profiles. These economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors, such as natural and cultural assets. Moreover, their dependence on increasing visitor numbers heightens rather than reduces sensitivity to any adverse impacts. To characterise these communities as having low sensitivity without a targeted, place-based analysis is not supported by evidence but rests on unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's conclusions and the adequacy of proposed mitigation measures for island communities.

1.1.898 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting important species such as seabirds, marine mammals, and basking sharks. This establishes the site's significant ecological value and sensitivity. The proposed development would involve construction, operation, and decommissioning activities on a very large scale and over several decades, thereby posing a considerable risk of adverse environmental effects. Given the recognised presence of protected species and habitats, the scale and duration of the project warrant thorough assessment and mitigation to prevent substantial harm to these vulnerable marine ecosystems.

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when it is not possible to exclude an adverse effect on the integrity of a protected site, indicating that the applicant recognises the potential for significant environmental impacts. This acknowledgement is a crucial aspect of the application and demonstrates an awareness of the sensitivity of the designated area.

These submissions are intended to serve as mitigation measures under derogation provisions, aiming to offset any potential harm that may arise from the proposed development. The preparation and inclusion of these documents show a proactive approach by the applicant to address the concerns associated with the protected guillemot population. It is important to note, however, that these plans are contingent upon the assessment and approval of relevant authorities.

Ultimately, the submission of these derogation and compensation documents underscores the importance of rigorous scrutiny by the Scottish Ministers, who may reach a different conclusion regarding the likelihood of adverse effects. This highlights the need for a thorough evaluation of the evidence before any determination is made on whether the proposed measures are sufficient to prevent harm to the protected site.

1.1.899 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that Ministers bear these factors firmly in mind when considering the representations made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

The Environmental Impact Assessment (EIA) submitted with the application serves as the principal evidential basis for determination; however, it falls short of sufficiency despite its extent. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively or relies on methodologies that undermine the robustness of its conclusions. For example, the landscape assessment derives outcomes based on a distance pattern that its own methodology does not support; the heritage assessment lacks demonstration of the application of its stated integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. Furthermore, the application depends in certain areas on future assessments, post-consent plans, ongoing monitoring, and additional approvals. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Consequently, the Scottish Ministers are compelled to decide based solely on the evidence before them, without presuming that unresolved matters will be adequately addressed subsequently. The applicant has therefore not demonstrated that the environmental information provided is sufficient to enable an informed decision.

1.1.900 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing

communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's assessment of visual and community impacts on Iona significantly underestimates their scale and importance, particularly when compared to established mitigation benchmarks. The Coastal Character assessment assigns the Sound of Iona a high sensitivity, noting its direct orientation towards the development area and extensive visibility. The scale of visual change is substantial, spanning approximately 21 kilometres with turbines covering about 39 degrees of the horizon. This magnitude of effect is classified as Moderate and Significant. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, the highest point. However, such recognition falls short of adequately addressing the depth of impact, especially given that familiar landmarks like Ben Hynish on Tiree, standing at 141 metres and visible from 33 kilometres, would be visually dominated by turbines extending roughly 194 metres at a closer distance of approximately two-thirds that range. This comparison underscores the disproportionate visual intrusion posed by the proposed development, which the applicant's own evaluation does not fully mitigate.

The heritage and community implications further reveal critical gaps in the assessment. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and high crosses, holds international significance, intrinsically linked to pilgrimage and sea arrival routes, as identified in the applicant's baseline studies. Despite Historic Environment Scotland's requests for additional viewpoints, including from the ferry crossing itself, the applicant has not provided visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby limiting the understanding of visual impacts on heritage assets. Moreover, community consultation on Iona indicates overwhelming opposition, with 92 per cent of households objecting to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the island's community, yet no assessment of this pathway has been undertaken. This omission further compromises the accuracy and completeness of the environmental and social impact evaluation, leading to an underrepresentation of the true scale and significance of effects on Iona.

The applicant's assessment acknowledges significant effects on key areas within Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having high sensitivity at distances of approximately 22 to 24 kilometres and is attributed a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition given to Fionnphort, the gateway to Iona and the primary embarkation point for visitors. This community, intrinsically linked to the visitor flow, is acknowledged as directly affected. Across Mull more broadly, significant effects are also accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having high sensitivity over distances ranging from approximately 21 to 33 kilometres, yet is attributed only medium magnitude effects. This discrepancy suggests a limited appreciation of the full visual and experiential impact on these sensitive landscapes and communities.

The assessment's approach notably relies on distance-based reasoning that underestimates the scale of change, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, a conclusion that appears to diminish the significance of industrialising the Atlantic seascape. This seascape is fundamental to Mull's west-facing tourism economy, including wildlife boat operations and the accommodation sector supporting western townships, none of which has been subject to detailed, place-based assessment. Consequently, the applicant's evaluation insufficiently addresses the profound visual, economic, and community impacts on these tourism-dependent communities and designated landscapes, thereby failing to fully recognise the significance of the development's effects on the integrity and sustainability of Mull and Ross of Mull's coastal environments.

The applicant's assessment recognises effects on the Loch na Keal National Scenic Area, within which the island of Ulva is situated, acknowledging its designation and the shared landscape qualities at stake. Ulva is a community-owned island currently undergoing regeneration, characterised by a small, re-establishing population whose recovery depends fundamentally on the preservation of its unspoilt seascape and setting. However, no specific assessment has been undertaken regarding the impacts on Ulva's community or landscape qualities, representing a notable omission.

Similarly, the applicant addresses Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development. Despite Staffa's status as one of the most celebrated small islands in Europe and its acknowledged panoramic maritime qualities, the applicant concludes that effects at this distance would be small and not significant. This conclusion is drawn notwithstanding NatureScot's request to assess effects up to around 30 kilometres, implying that Staffa lies beyond the suggested assessment boundary, yet the importance of its seascape qualities may warrant closer consideration.

The Jura National Scenic Area, situated approximately 28 to 32 kilometres from the development, is described by the applicant as having high sensitivity. The magnitude of impact is assessed as medium to low, tempered by factors such as distance,

scale, and retained landforms. Nonetheless, the designation of Jura hinges on its wild and undeveloped Atlantic character, which could be more vulnerable to change than the assessment suggests.

Lastly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances between 35 and 40 kilometres, receive a similar treatment in the assessment, with no indication of significant effects.

In summary, while the applicant's assessment identifies potential effects on several designated landscapes, it appears to underestimate or omit detailed consideration of impacts on vulnerable island communities such as Ulva and significant seascape qualities of celebrated islands like Staffa. The reliance on distance thresholds and assumptions of limited magnitude may inadequately reflect the sensitivity and value of these areas, thereby undermining the protection of their natural and cultural attributes.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite acknowledging its High sensitivity at a distance of approximately 35 kilometres. This conclusion contrasts sharply with the recognised sensitivity of the site, suggesting that the proposed mitigation measures or distance-related factors may have been overestimated in their effectiveness. When compared with other assessments where similar distances and sensitivities have resulted in higher magnitude ratings, this discrepancy indicates an inconsistency that undermines the reliability of the applicant's evaluation.

Tiree's unique topography and landscape character further challenge the Low magnitude conclusion. As an exceptionally low-lying island dominated by expansive sea and sky, its highest elevation, Ben Hynish, reaches only 141 metres. The introduction of turbines up to 335 metres tall would represent vertical structures unprecedented in the island's seascape. Such prominent features would inevitably alter the visual and experiential qualities that define Tiree's character. The assessment's failure to adequately reflect this substantial alteration leads to a significant understatement of potential effects.

In light of these considerations, the applicant's evaluation appears to underestimate the magnitude of change and consequent impacts on Tiree's sensitive and distinctive landscape. This understatement raises concerns about the overall reliability of the assessment, warranting a more thorough and calibrated appraisal to ensure that the full extent of effects on this exposed and valued receptor is properly recognised and addressed.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the proposed development area, resulting in an incomplete evaluation of potential impacts. This omission carries practical consequences for those communities whose well-being and local economies depend on the seascape, as their concerns remain unaddressed and their interests inadequately represented in the planning process.

Notably, the community-owned island of Gigha, a nationally recognised symbol of island regeneration following its purchase by residents, faces the development site

from the east. The finely balanced community and economy of Gigha have not been examined in the applicant's assessment, despite the likely sensitivity of this receptor to changes in seascape character and visual amenity. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the kind of receptors affected by the distance-based visual impact moderation that this objection highlights, yet they have not been properly accounted for.

Further, the chain of communities along the west coast of Kintyre, whose character and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters, share a comparable vulnerability. The Treshnish Isles and other small islands and mainland coasts with views towards the development area are similarly positioned. The exclusion of these receptors from the assessment undermines the comprehensiveness of the applicant's evaluation and risks overlooking adverse effects on the social and economic fabric of these interconnected communities. For these reasons, the assessment must be revisited to include a thorough appraisal of impacts on all relevant mainland and island receptors.

The applicant's approach to mitigation systematically diminishes the significance of effects on sensitive receptors located beyond 20 kilometres by moderating the magnitude of change and discounting the resulting impacts. This methodology effectively undermines the environmental impact assessment's integrity, as it fails to provide any place-based evaluation for the communities experiencing these effects. Taken together, the evidence demonstrates that wherever a highly sensitive receptor lies beyond this 20-kilometre threshold, the assessment's reductionist treatment leads to an absence of meaningful analysis for those affected populations. Consequently, the applicant's distance-based approach results in an incomplete and potentially misleading understanding of the environmental consequences, warranting reconsideration to ensure all significant effects are appropriately recognised and addressed.

1.1.901 Personal Observations

In addition to the planning matters above, I am personally concerned because: I believe the resident populations of the affected islands should have a voice which is listened to by the corporations .

Based on my own local knowledge, I also wish to highlight that: The communities , the environment and the wildlife should be protected from exploitation by the corporations .

Finally, I would also ask the Scottish Ministers to consider: I am supportive of green energy projects which work in harmony with our current landscapes and communities .

1.1.902 Summary

The proposal put forward by the applicant fails to satisfy the statutory and policy requirements governing its determination. Their own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as the cultural heritage and communities along this coastline. Independent analyses of the applicant's documentation reveal that these impacts have been understated. Moreover, a comprehensive heritage assessment, as mandated, has not been completed. The identified effects on the island communities within the project's influence have neither been adequately assessed nor addressed. Additionally, the ecological criteria necessary to demonstrate compliance remain unproven. It is also pertinent that only a portion of the overall project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal and reject the associated marine licence application.

Should the Scottish Ministers be inclined not to refuse consent outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Furthermore, it is essential that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 193
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, associated with application 00012385 for consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that my objection be officially recorded and that I am informed of the outcome of the determination process.

The proposal concerns the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 wind turbines, each with a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. This site lies to the north-west of Islay and to the west of Colonsay, at an estimated distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, structured around the statutory and policy frameworks governing the assessment of these applications. It is incumbent upon the applicant to furnish robust evidence demonstrating compliance with all relevant statutory tests. The onus does not rest upon objectors to disprove these claims. Having considered the submissions, it is clear that the applicant has failed to meet this evidential burden. Accordingly, the applications should be refused consent.

1.1.903 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria outlined in NPF4 Policy 11, resulting in significant adverse consequences for both the environment and local communities. Although Policy 11 supports renewable energy development, this support is conditional and must operate within the constraints of specific impact assessments, notably those addressing effects on communities, landscapes, seascapes, and other sensitive receptors.

In particular, the proposal would cause substantial harm to nationally designated landscapes and seascapes, undermining their protected status. Additionally, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has not been adequately addressed, raising concerns about the social implications of the development. Furthermore, the ecological assessments provided do not convincingly show that the necessary environmental tests can be met.

Given these unresolved issues, the proposal conflicts directly with the requirements of NPF4 Policy 11. It cannot be supported as it stands, since the adverse impacts on heritage, landscape, community, and ecology run counter to the policy’s intended balance between renewable energy advancement and environmental protection.

The proposal fails to comply with several National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in practical consequences that undermine these statutory safeguards. Specifically, Policy 11 must be read in conjunction with Policy 4(c) and 4(d), which seek to prevent significant adverse effects on the qualities of National Scenic Areas and other nationally important landscapes. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the setting of historic assets, impose clear duties to protect cultural significance. Policy 3 addresses biodiversity protection requirements. The evidence demonstrates that the proposal would cause significant adverse impacts on designated landscapes and seascapes, failing to uphold their protected qualities. Additionally, the applicant has not adequately demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities affected by the development would be safeguarded. Crucially, the ecological assessments submitted do not satisfy the necessary tests to ensure biodiversity protection as mandated by Policy 3. In light of these factors, the proposal is at odds with the cumulative policy framework of NPF4, raising substantial concerns regarding its acceptability in terms of nationally important environmental and heritage considerations.

The applicant’s evidence acknowledges that, in relation to terrestrial effects, the proposal conflicts with the Argyll and Bute Local Development Plan 2. Specifically, it would adversely impact the landscape, heritage, and community interests that the plan seeks to protect. This conflict extends to the wider development plan framework and National Planning Framework 4 when considered in their entirety. The applicant has not provided sufficient demonstration to overcome these conflicts. Consequently, the proposal is inconsistent with the relevant terrestrial development plan policies.

1.1.904 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects are deemed to cease. Nevertheless, an independently prepared Evidence Note, relying entirely on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, identifies a clear and consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This finding is corroborated by the applicant’s own documentation, which explicitly acknowledges the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. The practical consequence of this approach is that protective assessments rely on systematically moderated magnitude inputs at distances where some of the most sensitive designated landscapes are situated. As a result, the conclusions drawn from these assessments do not reliably represent the true effects that Scottish Ministers are being asked to consider and consent to.

The practical consequence of relying on the visualisation materials submitted is that they cannot fully convey the true scale and visual impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations are inherently limited in replicating the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent corrective tool. Consequently, the visual evidence provided must be treated with caution, as it cannot be assumed to represent an accurate or complete depiction of the development's visual effects. This limitation undermines the reliability of the visual assessment and should be given appropriate weight in the decision-making process.

When considering the impact of the proposed development on the night-time seascape, it is important to weigh the introduction of aviation and navigation lighting against existing conditions. Currently, the sea horizon remains unlit, contributing to the natural character of the area after dark. The proposed lighting would be a permanent addition for the duration of the project's 35-year operational life, fundamentally altering this aspect of the seascape.

While the operational timeframe may suggest a finite period of impact, this does not diminish the significance of the harm in planning terms. The decision to approve the development would effectively signify an acceptance that the seascape is appropriate for wind farm use, thereby setting a precedent for future changes to this previously unlit environment.

Therefore, any assessment of the development's effects must carefully consider the balance between the benefits of renewable energy infrastructure and the irreversible change to the night-time seascape character. This balance should inform policy decisions, ensuring that the visual and environmental qualities of the seascape are adequately protected or mitigated where possible.

The applicant acknowledges that the proposed development would result in effects engaging several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies are designed to safeguard nationally important landscapes and seascapes by ensuring that any developments do not cause unacceptable harm to these designated areas. The applicant's recognition of these policy engagements underscores the significance of the potential impacts arising from the proposal.

However, the applicant has failed to demonstrate that the conclusions reached regarding the scale of these accepted effects are consistent with the methodology it employs. Moreover, the applicant has not provided sufficient evidence to confirm compliance with the policies protecting nationally important landscapes and seascapes. This shortfall indicates a lack of robust justification for the proposal's acceptability under the relevant planning framework, thereby undermining confidence that the development would satisfactorily safeguard the identified landscape and seascape interests as required by national policy.

1.1.905 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is maintained, this crucial evaluative step is absent. Instead, the assessment focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but does not demonstrate how these observations translate into an assessment of setting integrity as required. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not evidence the necessary evaluative process, casting doubt on its conclusion that the integrity of setting is adequately retained.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

There remains significant uncertainty regarding the application's compliance with critical policies designed to safeguard heritage assets. Specifically, the proposal engages National Planning Framework 4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of such assets. These provisions, in conjunction with Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, establish a robust framework for the protection of cultural heritage. However, the applicant has not provided sufficient evidence to demonstrate

that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained or preserved.

This lack of a comprehensive and conclusive assessment leaves the Scottish Ministers without the necessary information to determine that the proposed development would meet the stringent requirements of the relevant policies. The absence of such a vital evaluation undermines confidence in the application's acceptability from a heritage protection standpoint. Consequently, it is submitted that the application fails to satisfy key policy obligations, warranting careful reconsideration before any approval can be granted.

1.1.906 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social sustainability. These visitors are drawn specifically by the qualities identified in the applicant's own baseline studies: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Any alteration to these fundamental attributes would directly undermine the economic foundation upon which these communities depend.

Such a detrimental impact would extend beyond the immediate loss of visitor appeal. The economic consequences would inevitably affect local services, diminish the resident population, and threaten the ongoing viability of the island communities as a whole. Therefore, the proposal poses a serious risk to the essential qualities that sustain these communities and should be carefully reconsidered in light of this critical dependence.

The proposal fails to comply with essential planning and statutory requirements concerning island communities, resulting in inadequate consideration of their interests. Specifically, it neglects the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be properly assessed and given due weight through meaningful engagement from the earliest stages of a proposal to its conclusion. Despite recognising that island communities warrant particular scrutiny, the applicant has not undertaken the necessary assessment to understand the potential effects on these communities. Consequently, it has not demonstrated that the proposal aligns with the principles of sustainable island communities, nor has it discharged the statutory duties owed to them. In light of this, the proposal does not meet the required planning and statutory standards for protecting island communities and should not be supported.

1.1.907 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, placing highly sensitive ecological assets directly within the zone of proposed activity. Surrounding waters are also known to support a range of protected species, including seabirds, marine mammals, and basking sharks, which rely on these

habitats for feeding, breeding, and migratory pathways. The scale of the proposal is substantial, involving construction, operation, and eventual decommissioning phases extending over several decades, thereby introducing prolonged and potentially cumulative pressures on these environmentally critical components.

Given the ecological significance of the site and adjacent marine environment, the introduction of large-scale industrial activity raises serious concerns regarding adverse environmental effects. The presence of Priority Marine Features within the development footprint, coupled with the usage of surrounding waters by protected species, underscores the need for rigorous assessment and mitigation strategies. Without such measures, the proposal risks causing substantial harm to habitats and species of national and international importance, undermining biodiversity objectives and statutory conservation priorities.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when the potential for adverse effects on the integrity of a protected site cannot be definitively ruled out. Their very submission signals the applicant's acknowledgement of possible impacts and the need for measures to address them under derogation provisions.

Notably, the inclusion of these documents indicates that the applicant anticipates that Scottish Ministers might reach a different conclusion regarding adverse effects than the applicant's own assessment. This recognition highlights a degree of uncertainty and underscores the importance of the derogation and compensation proposals as integral components of the application's approach to mitigating potential harm to the protected guillemot population.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The applicant's submission fails to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal an insufficient degree of certainty that the legal requirements can be met, thereby undermining the protections afforded to these ecological features. Given this clear shortfall, the application does not fulfil the necessary legal criteria, and consent should therefore be withheld.

1.1.908 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it considers only part of the project, namely the wind farm itself, while deferring key components such as the export cable corridor and the onshore transmission works to subsequent applications. As these elements are essential for the operation of the wind farm, their exclusion means that the full effects of the project are never evaluated together. This segmented approach contradicts established legal principles, as confirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than divided into smaller parts whose individual impacts appear less significant. By fragmenting the consenting process in this way, important aspects of the project's environmental and planning implications are deferred until after the principal decision has been made, thereby undermining the integrity and completeness of the overall assessment.

The cumulative impact assessment relies heavily on the foundational conclusions drawn within the broader Environmental Impact Assessment, particularly those relating to landscape, heritage, and socio-economic factors. Where these initial assessments have understated the magnitude of effects, the cumulative analysis inherently adopts the same diminished baseline. This approach results in a compounded underestimation of the combined impacts when considering this proposal alongside other developments that are existing, consented, or foreseeable. Consequently, the mitigation measures proposed may appear more effective than they truly are, as they are based on an incomplete understanding of the baseline conditions.

The flaw in the baseline assessments is critical because it sets the parameters against which all subsequent cumulative impacts are measured. If the starting point is inaccurately low, the additive or synergistic effects of multiple developments will not be fully captured. This raises concerns regarding the reliability of the cumulative assessment, as it may fail to identify the true scale and significance of impacts on the environment and local communities. Without a robust and accurate baseline, any conclusions about the effectiveness of mitigation or the acceptability of cumulative effects are necessarily compromised.

In light of these considerations, it is essential that the cumulative impact assessment be revisited with a more accurate and comprehensive baseline. Only through a thorough reassessment can a reliable understanding of combined effects be established, ensuring that mitigation measures are appropriately targeted and effective. Until such steps are taken, the current cumulative assessment should be regarded as insufficiently robust to support planning decisions with confidence.

The assessment finds that the applicant has failed to comply with the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal have not been reliably identified or assessed, and the effects of the project in its entirety remain unclear. Given these shortcomings, it is essential that the treatment of any deferred works be explicitly considered within the decision-making

process. Without this, the proposal does not meet the necessary policy and regulatory standards for proper environmental assessment.

1.1.909 Public Engagement, Site Selection and Environmental Information

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.910 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation principally approaches Islay as a potential project location rather than considering it as a distinct island community that will be directly affected. Notably, the Atlantic-facing communities of Islay are situated adjacent to the nearest edge of the 448 square kilometre development area, yet the application fails to provide a place-based assessment of how this proximity will impact the community's setting, economy, or daily life. This omission raises concerns about the thoroughness of the environmental and social impact analysis for Islay, given its unique exposure and relationship to the development site.

For Colonsay and Oronsay, the seaward outlook is integral to daily life, directly facing the proposed array. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation strategy, acknowledging that harm to the internationally protected

seabird populations of these cliffs cannot be entirely ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community and is vulnerable to impacts on its open maritime setting. The shortcomings identified in the heritage assessment for other assets apply equally here, undermining confidence in the adequacy of the heritage impact evaluation. Taken together, these points demonstrate an underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall reliability of the environmental and heritage impact appraisal.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. The West Coast of Iona is similarly acknowledged as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Despite this recognition, the applicant's evaluation appears to understate the scale and significance of impacts on Iona's internationally important monastic heritage landscape, comprising the Abbey, the Nunnery, and the high crosses. These heritage assets are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, factors emphasised in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has not provided visualisations from critical vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits a full understanding of the visual effects on the heritage setting.

Community concerns further illustrate the potential underestimation of impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting strong local opposition. Notably, habitability—a pathway of potential effect identified by the applicant's consultants—was never assessed in relation to this community. To appreciate the scale of the turbines' visual dominance, the applicant's evidence compares them to the familiar landmark of Ben Hynish on Tiree, which at 141 metres is visible from Iona at approximately 33 kilometres; the proposed turbines would overtop Ben Hynish by about 194 metres at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points suggest that the applicant's environmental and social impact evaluation does not fully capture the magnitude of effects on Iona.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, attributing a High sensitivity at distances of approximately 22 to 24 kilometres and a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition that Fionnphort—the gateway to Iona and the embarkation point for visitors—is the community most directly affected by changes to visitor flows. Across Mull, the applicant similarly accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic

Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet it is attributed no more than Medium magnitude of impact.

This assessment, however, demonstrates an overreliance on distance-based reasoning that inadequately captures the significance of effects on key coastal areas. For example, the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the scale of change is judged small due to a viewing distance exceeding 30 kilometres, exemplifies this limited approach. Such a methodology fails to account for the qualitative importance of these landscapes to local communities and tourism.

Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, is fundamentally dependent on the Atlantic seascape that the proposed development would industrialise. Despite this, no place-based assessment has been provided for these communities. Consequently, the applicant's evaluation underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull's coastal landscapes and the tourism-dependent populations that rely upon them.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, which lies approximately 35 kilometres from the proposed development, is classified as having High sensitivity. Despite this, the applicant attributes only a Low magnitude of change to this receptor. This is inconsistent with the nature of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres. In this context, turbines reaching up to 335 metres would introduce vertical structures unprecedented in

Tiree’s seascape, disrupting the open oceanic horizon that is fundamental to its character. Given this exposure and sensitivity, a Low magnitude conclusion is clearly a severe understatement, undermining the credibility of the overall impact assessment.

The applicant’s assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by local residents, faces the development waters from the east. Yet, the assessment fails to examine the potential impacts on this finely balanced community and its economy.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent receptors of high sensitivity; however, the distance-based moderation approach applied in the assessment overlooks the quality and importance of these views and their associated economic benefits to the local area.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts with views towards the proposed development site share a similar reliance on these seascapes. The exclusion of these receptors from the applicant’s assessment undermines the comprehensiveness and accuracy of the overall evaluation.

There remains considerable uncertainty regarding the applicant’s methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant’s approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.911 Personal Observations

In addition to the planning matters above, I am personally concerned because: Not my community, but a community that I have often visited.

Based on my own local knowledge, I also wish to highlight that: It will negatively change the environment, landscape and impact massively on wildlife.

1.1.912 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the local communities and cultural heritage of the coastal region. Furthermore, analysis of the applicant's submitted documentation reveals that these impacts have been underestimated, and a comprehensive heritage assessment, as mandated, has not been completed. While the implications for the island communities affected by the development were identified, they have not been subjected to proper assessment. Additionally, the ecological criteria necessary for approval remain unproven, and notably, only a portion of the overall project has been presented for consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that the Scottish Ministers should decline consent for the proposed offshore wind farm and refuse the corresponding marine licence. Should the Ministers decide against refusal, it is requested that they seek further environmental information and enhanced visual representations, and that the applications only be determined following a public inquiry. Such an inquiry would enable thorough examination of the concerns raised in this objection. Irrespective of the decision reached, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 194
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm, which is currently under consideration through application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, operating as ScottishPower Renewables. I request that this correspondence be recognised as an official objection, that I am recorded as an objector, and that I receive notification of the final determination relating to these proposals.

The project in question involves the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It is proposed to include between 91 and 144 wind turbines, each potentially reaching a maximum height of 335 metres to blade tip. The designated Windfarm Development Area spans roughly 448 square kilometres of marine environment situated north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona. This location lies in proximity to various islands and coastal settlements within the southern Hebrides.

The following sections articulate the grounds for objection, grounded firmly in the relevant statutory and policy framework that governs the assessment and determination of these applications. It is imperative to emphasise that the onus lies with the applicant to substantiate, by means of adequate and robust evidence, that all applicable statutory tests and policy requirements have been met. Objectors are not obliged to demonstrate the contrary. Upon careful examination of the evidence presented, it is clear that the applicant has failed to satisfy the requisite burden of proof. Consequently, I contend that consent for the MachairWind Offshore Wind Farm should be withheld.

1.1.913 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not show that these requirements have been satisfactorily addressed.

In addition, the Scottish Ministers, in their determination, are also required to have regard to these statutory duties. The application’s failure to demonstrate compliance, coupled with identified deficiencies and omissions in addressing these legal obligations, constitutes a material conflict with the applicable legal and policy framework. Such shortcomings weigh decisively against the granting of consent for this proposal.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted. These shortcomings represent a failure to meet the legal and policy framework governing such proposals. As a result, the application cannot be considered to have adequately addressed the potential environmental impacts or the statutory protections afforded to European protected sites.

Given the absence of a complete and compliant environmental impact assessment and habitats regulations assessment, the proposal conflicts with the mandatory legal requirements. This failure weighs decisively against the granting of consent. The application should therefore be refused on the grounds of non-compliance with the statutory environmental assessment and habitats protection obligations.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique needs and circumstances of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or given due weight. Such deficiencies and omissions constitute a clear conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with this statutory duty is not demonstrated, these shortcomings must weigh against the granting of planning consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the proposal should be refused.

1.1.914 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. While NPF4 Policy 11 endorses such development, this support is explicitly conditional upon adherence to its impact provisions, including Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) addressing impacts on landscape, seascape, and other receptors. The proposal does not satisfy these criteria and consequently conflicts with the policy's requirements.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, a matter of considerable weight in the

planning balance. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments submitted fail to confirm that the necessary environmental protections can be achieved. Taken together, these shortcomings establish a clear conflict with NPF4 Policy 11's impact tests, indicating that the proposal should not attract policy support.

The proposal's mitigation measures fall short when compared against the comprehensive safeguards established by relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be considered alongside Policy 4(c) and 4(d), which explicitly protect National Scenic Areas and nationally significant landscapes from significant adverse impacts on their defining qualities. Additionally, Policy 7, particularly 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the settings of historic assets, imposes stringent requirements to preserve cultural significance. Policy 3 further demands robust ecological safeguards. The submitted evidence does not demonstrate that the proposed mitigation would adequately prevent significant harm to these designated assets, thereby failing to meet the combined intent and standards of these policies.

In light of the evidence, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. There is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be protected in accordance with policy expectations. Furthermore, the ecological tests required under Policy 3 have not been shown to be capable of being met based on the information provided. Consequently, the proposal is in clear conflict with multiple NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity, and therefore should not be supported.

Uncertainty remains regarding the extent to which the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. The concerns centre on the adverse effects the development would have on the landscape, heritage, and community interests that these policies are explicitly designed to protect. This raises significant questions about the proposal's compatibility with local planning objectives intended to safeguard these valued aspects of the environment and society.

In light of these conflicts, it is evident that the proposal does not accord with the development plan framework, nor with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise. Consequently, the proposal should be regarded as inconsistent with the relevant planning policies, and this inconsistency weighs heavily against its approval.

1.1.915 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant's

own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. Furthermore, the applicant's own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

The visualisation materials submitted in support of the application are inherently limited in their ability to convey the true scale and impact of the development as experienced on site. According to NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections share these same limitations, as they are technical renderings embedded within the visualisation rather than independent corrections or enhancements. Consequently, reliance on these materials alone may lead to an underestimation of the development's visual effects, and this should be carefully considered in the assessment process.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape, which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

The applicant's evidence acknowledges that the proposal's effects engage several key policies designed to safeguard landscape and seascape interests. Specifically, these effects relate to National Planning Framework 4 (NPF4) Policy 4(c) and 4(d),

Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. This recognition indicates that the proposal falls within the scope of established policy measures intended to protect nationally important landscapes and seascapes from adverse impacts arising from development activities.

However, despite this acknowledgement, the applicant has not demonstrated that its conclusions regarding the scale of the accepted effects are consistent with its own stated methodology. Moreover, there is a failure to show compliance with the policies explicitly aimed at protecting these nationally significant landscape and seascape assets. This lack of methodological consistency and evidential substantiation calls into question the adequacy of the applicant's assessment and undermines confidence in the proposal's conformity with the relevant planning frameworks. Consequently, the proposal does not meet the requirements of the key policies that seek to safeguard landscape and seascape interests, thereby warranting careful reconsideration.

1.1.916 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the applicant's adherence to the established methodology for assessing effects on the setting of historic assets, which calls into question the reliability of their conclusions about heritage impacts. While the applicant states that they have adopted Historic Environment Scotland's recognised methodology—developed through consultation and requiring an evaluation of how changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—this process is not clearly demonstrated. The methodology explicitly cautions against equating visual change directly with adverse impact. However, a published Methodological Audit, based solely on the applicant's Appendix 14.3, identifies that although the assessment acknowledges relevant heritage attributes and describes visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to show how the integrity of setting has been evaluated in line with the accepted methodology. Crucially, the necessary evaluative step that distinguishes mere description from a robust assessment of integrity is absent across all examined examples. This omission undermines confidence in the assessment's conclusions that the integrity of setting is adequately retained.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

The applicant's heritage conclusions are fundamentally reliant on the findings of the landscape assessment. This dependency is critical, as the landscape assessment forms the evidential foundation upon which the heritage impact conclusions are constructed. Any shortcomings or inaccuracies within the landscape evaluation inevitably influence the validity of the heritage assessment.

It has been demonstrated that the landscape effects have been understated, as outlined in the preceding analysis. This understatement is not a trivial matter; rather, it represents a significant deficiency that affects the overall appraisal. Because the heritage conclusions are predicated on the landscape assessment, any minimisation of landscape impacts is directly transmitted into the heritage impact findings, thereby diminishing their reliability.

Consequently, the credibility of the heritage conclusions is compromised by the inherent weaknesses within the landscape assessment. A more robust and accurate landscape evaluation is essential to ensure that the heritage impacts are properly understood and fairly assessed. Without addressing these deficiencies, reliance on the current heritage conclusions remains questionable and potentially misleading.

There remains significant uncertainty regarding the application's compliance with critical policies designed to safeguard heritage assets. Specifically, the proposal engages National Planning Framework 4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of such assets. These provisions, in conjunction with Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, establish a robust framework for the protection of cultural heritage. However, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained or preserved.

This lack of a comprehensive and conclusive assessment leaves the Scottish Ministers without the necessary information to determine that the proposed development would meet the stringent requirements of the relevant policies. The absence of such a vital evaluation undermines confidence in the application's acceptability from a heritage protection standpoint. Consequently, it is submitted that the application fails to satisfy key policy obligations, warranting careful reconsideration before any approval can be granted.

1.1.917 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore,

the proposal's impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant

planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.918 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over a period of several decades. This prolonged disturbance has the potential to cause significant adverse effects on the Priority Marine Features and Annex I habitats located within the development area itself. Given the scale and duration of the project, the cumulative impacts on the local ecosystem warrant careful consideration.

The surrounding waters of the site are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for essential life processes such as feeding, breeding, and migration. Any disruption to their habitat, whether through noise, water pollution, or physical presence, could have detrimental consequences for their populations, which may already be vulnerable.

In light of the ecological importance and sensitivity of both the site and its adjacent waters, it is imperative that the potential environmental effects of the proposed development are thoroughly assessed and mitigated. Failure to do so risks significant harm to nationally and internationally protected marine features and species. Consequently, the proposal should be reconsidered in view of these environmental constraints.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population of the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively excluded. This submission underscores the applicant’s recognition of potential adverse impacts arising from the proposal. Moreover, the inclusion of these documents is a significant feature of the application itself, indicating that, according to the applicant’s own reasoning, the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. While the provision of derogation and compensation plans demonstrates a proactive approach to addressing environmental concerns, it also highlights inherent uncertainties about the proposal’s impact on the protected guillemot population, warranting careful and thorough consideration.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, are insufficient on their own to satisfy the stringent requirements set by the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be convinced beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the habitat in question. This represents a high evidential threshold which the applicant bears the burden of demonstrating, ensuring that no residual uncertainty remains regarding potential harm.

This legal framework is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, they underscore the critical importance of safeguarding protected habitats and species, mandating that any consent be contingent on the strict derogation tests being met. Consequently, the policy and legislative context demands rigorous scientific certainty rather than reliance on proposed mitigation alone.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant's own derogation documents, which collectively reveal an absence of the requisite certainty regarding compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.919 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the proposed development, explicitly excluding the export cable corridor and the onshore transmission works that are essential for the wind farm's operation. This partial submission results in a fragmented evaluation whereby the cumulative effects of the entire project are never considered in a single, comprehensive review. The deferred elements will be subject to separate consenting processes subsequent to the principal decision, thereby precluding a holistic appraisal of the project's environmental and operational impacts at the critical initial stage.

Such an approach is fundamentally at odds with established legal principles, notably those upheld by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than segmented into smaller components with individually diminished apparent effects. By permitting the project to be effectively "salami-sliced," the decision-making process risks underestimating the true scale and significance of the development's impacts. This fragmented methodology undermines the integrity of the planning assessment and fails to provide a robust basis for informed determination, thereby rendering the current approach legally and procedurally flawed.

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This underestimation arises because the assessment is founded on baseline conclusions that themselves understate the impacts on landscape, heritage, and socio-economic factors. Consequently, decision-makers may be misled about the scale and severity of the cumulative impacts when considering the overall acceptability of the proposal.

This issue stems directly from the methodology employed in the Environmental Impact Assessment, where the baseline assessments for key receptors are flawed.

As these initial evaluations set the foundation for the cumulative impact assessment, any understatement at this stage propagates through subsequent analyses. The result is a diminished perception of the combined effects, which fails to capture the full extent of the potential harm when the proposal is considered in context with other developments in the area.

Given these concerns, it is essential that the cumulative effects are reassessed using more accurate and robust baseline data to ensure a reliable understanding of the overall impact. Until such improvements are made, the current assessment cannot be regarded as a sound basis for planning decisions, and the cumulative impacts of the proposal remain inadequately addressed.

The applicant's submission fails to comply with the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Specifically, there is no adequate demonstration that the cumulative and in-combination effects of the proposal, nor the impacts of the project in its entirety, have been thoroughly identified or assessed. Furthermore, the approach to deferred works remains unaddressed in the application. It is therefore essential that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory obligations.

1.1.920 Public Engagement, Site Selection and Environmental Information

The failure to ensure effective public participation has materially compromised the legitimacy of the site-selection process and subsequent application. The applicant requests that the Scottish Ministers place significant weight on the site-selection exercise; however, the deficiencies in public engagement throughout both the plan and site-selection stages have persisted into the current application phase. This application is supported by an extensive volume of technical documentation spanning many thousands of pages, yet the consultation window was scheduled during the busiest months for the island communities concerned. During this peak visitor season, residents are continuously engaged in work and specialist advice becomes scarce, severely limiting their capacity to engage meaningfully with the proposals. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must be afforded a realistic opportunity to participate in decisions of this scale. The conditions imposed on the local communities have fallen short of this threshold, undermining the fairness and transparency of the process. In light of these considerations, it is imperative that the Ministers give due weight to these deficiencies when evaluating the representations made. The inadequacy of the consultation process represents a fundamental procedural flaw that calls into question the robustness and legitimacy of the site-selection and application decisions.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination.

However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.921 Effects on Local Area

The proposed development encompasses a substantial area of 448 square kilometres immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands. Despite this, the applicant’s assessment predominantly considers Islay in terms of its potential as a project location rather than as a distinct island community directly affected by the development. The Atlantic-facing communities of Islay, which confront the nearest edge of the development zone, have not been subject to any detailed, place-based evaluation of the likely impacts on their setting, local economy, or community life. This omission raises significant concerns about the adequacy of the environmental and heritage impact evaluation provided.

Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the proposed array, are similarly underassessed. The North Colonsay and Western Cliffs Special Protection Area lies along Colonsay’s coastline and is central to the applicant’s derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations at these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, is situated within this community, yet the identified deficiencies in the heritage assessment apply equally to its open maritime setting. Collectively, these factors demonstrate that the applicant’s evaluation fails to capture the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall impact assessment.

The applicant's own Coastal Character assessment recognises that the Sound of Iona is of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The overall effect is classified as Moderate and Significant, impacting an area approximately 21 kilometres away, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. This demonstrates that the scale of visual impact is substantial and geographically extensive.

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment fails to adequately address the significant visual and economic impacts on Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Although the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres, it is only attributed medium magnitude effects. The applicant concedes significant effects at Erraid and on the Core Paths of the Ross, as well as on Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors. This community is directly tied to visitor flows and would therefore experience substantial consequences. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. Notably, the Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is acknowledged as highly sensitive at distances between 21 and 33 kilometres, yet is assigned only medium magnitude impacts. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are downplayed due to viewing distances exceeding 30 kilometres, despite the evident scale of change. Crucially, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, its wildlife boat operations, or the accommodation sector in its western townships, all of which depend heavily on the Atlantic seascape that the development would industrialise. This omission overlooks the practical consequence that these communities and their economic activities would be detrimentally affected by the proposed development.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, and attempts to evaluate the potential effects of the proposed development on their qualities. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the early stages of regeneration, with a small population whose recovery relies heavily on the integrity of its natural setting and unspoilt seascape. However, the applicant's assessment does not provide a specific evaluation of the effects on Ulva's landscape or community, despite the island sharing fully in the impacts on the designated area.

Regarding Staffa, although located approximately 35 kilometres from the development site—beyond the 30-kilometre radius recommended by NatureScot for assessment of National Scenic Area qualities—the applicant acknowledges the panoramic maritime qualities of the island but concludes that the scale of change would be small and the effect not significant. This conclusion appears to downplay the importance of Staffa's celebrated status as one of Europe's most renowned small islands.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

In summary, while the applicant's assessment acknowledges the presence of these important designated landscapes and their varying sensitivities, it appears to underestimate or omit detailed consideration of significant effects, particularly with regard to Ulva's vulnerable island community and the cultural and natural qualities of the more distant but highly valued islands such as Staffa and Jura. This raises concerns that the full extent of potential impacts on these landscapes and communities has not been adequately addressed, thereby undermining the protection of their distinctive natural and cultural characteristics.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant’s assessment fails to consider significant effects on mainland and island communities that have direct views of the development and rely on the seascape economically, thereby undermining the comprehensiveness of the evaluation. Gigha, a community-owned island notable for its successful regeneration, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the applicant’s distance-based moderation approach, which diminishes their acknowledged importance. Furthermore, the west coast of Kintyre comprises a series of communities whose character, outlook, and visitor economy are intrinsically linked to the open Atlantic seaboard, including views toward Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts with sightlines toward the development area are similarly positioned, yet none have been adequately assessed. This omission raises concerns about the thoroughness of the environmental and socio-economic evaluation presented.

The applicant’s reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.922 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: One of Scotlands greatest attractions is its natural and historic landscape. This proposed development will negatively impact this and will be detrimental for both locals, tourists and Scotland as a whole. Who will benefit from it? I do not believe that it will be the Scottish people who will benefit from this proposed development.

1.1.923 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. However, independent analysis of the submitted documents reveals that the extent of these impacts has been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on the island communities affected were identified, no formal assessment of these impacts has been undertaken. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers concerns only a portion of the entire project.

Given these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the application be determined following a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address and provide clear conclusions on the effects of the proposal on cultural heritage and the impacted island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 195
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. The project entails the erection of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area encompassing some 448 square kilometres of marine space north-west of Islay and west of Colonsay, at a distance of roughly 21 kilometres from Iona, and in proximity to several islands and coastal communities in the southern Hebrides.

I request that this correspondence be formally recorded as an objection, that my status as an objector be acknowledged, and that I am kept informed of any decisions relating to these applications.

The detailed planning and environmental grounds underpinning my opposition are set out below, framed within the statutory and policy context governing the determination of such proposals. It is important to emphasise that the responsibility lies squarely on the applicant to provide compelling and adequate evidence demonstrating compliance with all relevant statutory tests. The duty is not on those raising objections to prove the contrary. In this instance, the applicant has failed to satisfy the evidential requirements necessary to justify consent. Consequently, the applications should be refused.

1.1.924 Legislative and Policy Framework

The marine licence application is required to be determined under Part 4 of the Marine (Scotland) Act 2010, with authorisation decisions made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The statutory assessment must consider compliance with the General Policies of the National Marine Plan, notably GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish a comprehensive legal and policy framework that the application must satisfy to merit consent.

The evidence indicates that the application has not demonstrated compliance with these statutory requirements and relevant policies. Deficiencies, omissions, and conflicts with the applicable legal and policy framework have been identified, including failures to adequately address cumulative impacts, historic environment considerations, and the need for sound evidence. Such shortcomings are material and weigh decisively against the granting of consent. In the absence of demonstrated compliance, the application fails to meet the statutory tests under the

Marine (Scotland) Act 2010 and the National Marine Plan, and therefore must be refused.

The applicant's submission must be considered in light of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests.

In this case, the evidence before the determining authority does not demonstrate compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment provided. The failure to adequately identify and assess the significant environmental effects, as well as the absence of a proper statutory test application regarding European protected sites, constitutes a breach of the legal and policy framework governing such proposals.

Given that compliance with these regulations has not been established, and the evidence reveals substantive shortcomings, these matters must weigh against the granting of consent for the proposal. Therefore, the application should be refused on the grounds of inadequate environmental impact assessment and failure to satisfy the Habitats Regulations.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique circumstances and needs of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or integrated into the decision-making framework. Such deficiencies constitute a clear omission and conflict with the applicable legal and policy framework. In accordance with the established principle that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals shortcomings or legal conflicts, these factors must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It remains uncertain whether the proposal satisfies every statutory duty, planning policy, and environmental assessment obligation, as the evidence submitted is neither robust nor sufficiently objective or proportionate to establish such compliance beyond doubt.

The applicant bears the onus of providing clear and comprehensive evidence that all applicable frameworks have been met. However, the documentation presented contains deficiencies and omissions that undermine confidence in the proposal's

conformity with the legal and policy regime. These shortcomings have not been addressed or remedied, leaving critical gaps in the evidential record.

Where compliance cannot be conclusively demonstrated, or where conflicts with statutory and policy provisions persist, these unresolved issues must weigh decisively against the granting of consent. In this case, the absence of satisfactory evidence confirming adherence to all relevant requirements compels refusal. The applicant's failure to meet the evidential burden is a fundamental flaw that precludes lawful approval of the development.

1.1.925 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant's written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant's own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

The applicant's submission incorporates NatureScot's visualisation guidance, which explicitly recognises inherent constraints in the visual materials presented. This guidance notes that printed visualisations are unable to fully replicate the scale perceived by a viewer on site, acknowledging a fundamental limitation in accurately conveying the true visual experience through such media. Furthermore, the wireline drawings included within the panoramic projections share these limitations as they are intrinsically linked to the photographic content they accompany.

It is important to understand that these wireline drawings function as technical renderings embedded within the visualisations rather than serving as independent tools to correct or enhance the photographic representation. Consequently, their value is confined by the same perceptual and technical restrictions as the

photographs, limiting their ability to provide an entirely objective or comprehensive view of the proposed development's visual impact.

Given these constraints, the visual evidence must be considered with an awareness of its limitations. While it remains a valuable component of the assessment, the inherent technical and perceptual shortcomings mean that it cannot be relied upon in isolation to fully inform judgements regarding the development's visual effects. A balanced approach, incorporating this understanding, is therefore necessary when evaluating the material presented.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The proposal's acknowledged effects engage multiple provisions of the National Planning Framework 4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this clear policy relevance, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with the methodology it purports to have employed. This shortcoming undermines confidence in the accuracy and reliability of the impact assessments presented. Moreover, the proposal does not evidence compliance with the policies designed to protect nationally important landscapes and seascapes, which are of significant planning and environmental value. In light of these deficiencies, it is concluded that the proposal does not meet the requirements of the key planning policies safeguarding landscape and seascape interests and should therefore be refused.

1.1.926 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of effects on the setting of historic assets is stated to follow Historic Environment Scotland's recognised methodology, which has been developed and refined in consultation with that body. This methodology requires an evaluation of whether changes to the setting affect the contribution that setting makes to the cultural significance of heritage assets, and whether the integrity of the

setting is adequately retained. Importantly, it is made clear that visual change alone should not be directly equated with adverse impact.

However, a detailed Methodological Audit, prepared to support community objections and working solely from the applicant's Appendix 14.3, reveals significant shortcomings in how the applicant's assessment has been conducted. While the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—discussing factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of the setting is adequately retained. Crucially, the Audit finds that the essential evaluative step required by the methodology is absent in all of the examined worked examples.

This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the assessment does not adequately apply the prescribed methodological framework to determine whether the setting's contribution to cultural significance is materially affected. Consequently, the assessment's integrity and the robustness of its findings on heritage impacts must be called into question.

The applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the

same understatement. This creates a chain of understated impacts, whereby the significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

The application engages directly with key national policies concerning heritage protection, specifically NPF4 Policy 7(h) relating to scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, it invokes the provisions of Policy GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a rigorous framework intended to safeguard the cultural significance of heritage assets of international and national importance, ensuring their settings are preserved in the planning process.

Despite the clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers have not been presented with the comprehensive assessment necessary to reach such a conclusion. This omission undermines the application’s compliance with the relevant heritage protection policies and consequently calls into question its acceptability within the established planning framework.

1.1.927 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant’s own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The applicant's own consultants acknowledged that habitability represented a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities but omitting an equivalent place-based evaluation of the island communities directly facing the development. Notably, the assessment concludes that these island communities exhibit low sensitivity to tourism effects, a finding reached without targeted analysis of the unique circumstances of those islands.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly susceptible to changes in the attributes attracting visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies reliance on the environmental and social qualities that may be jeopardised by the proposal. Therefore, the conclusion of low sensitivity drawn without a place-specific assessment lacks evidential support and should be regarded as an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology falls short of providing a robust understanding of the potential impacts on island communities. A more nuanced, place-based approach is necessary to adequately capture the vulnerabilities and dependencies of these communities, thereby informing effective mitigation measures. Without such an approach, the assessment risks underestimating the true socio-economic consequences of the proposal for the affected island populations.

The proposal fails to meet essential planning and statutory requirements for the assessment and protection of island communities, resulting in a significant risk that their interests will be inadequately considered and potentially harmed. Without a robust and comprehensive evaluation of socio-economic impacts on these communities, the decision-making process lacks a sound evidential basis, undermining the precautionary principles mandated where evidence is insufficient. This failure directly conflicts with the practical necessity of safeguarding the sustainability and wellbeing of island populations.

The applicant explicitly acknowledged that island communities warrant particular scrutiny; however, it did not undertake the necessary assessments to fully understand or mitigate the potential effects of the proposal on these communities. Consequently, it has not demonstrated that the development is compatible with the maintenance of sustainable island communities. This omission represents a serious shortfall in addressing the requirements set out in the National Marine Plan,

specifically GEN 19 and paragraph 4.81, as well as the relevant provisions of NPF4 Policy 11(c).

Moreover, the statutory duties enshrined in the Islands (Scotland) Act 2018 have not been fulfilled, as there is no evidence of meaningful engagement with island communities from the inception of the proposal through to its conclusion. This lack of engagement and failure to weigh their interests appropriately is contrary to established legal and policy frameworks designed to ensure that island communities are not disproportionately impacted by development proposals. On this basis, the proposal cannot be considered compliant with the necessary planning and statutory standards and should therefore be refused.

1.1.928 Ecology, Biodiversity and Habitats Regulations

The proposed development area encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and importance. Additionally, the surrounding marine environment supports a range of protected species, including seabirds, marine mammals, and basking sharks. Given the presence of these features and species, any construction, operational, and decommissioning activities must be carefully considered to avoid significant adverse environmental effects. However, the scale and duration of the proposed activities—spanning decades—present a substantial risk of disturbance and habitat degradation that cannot be readily mitigated to an acceptable level.

While mitigation measures may reduce certain impacts, the introduction of large-scale development activity into such a sensitive ecological context is inherently problematic. The Priority Marine Features and Annex I habitats within the development footprint are of high conservation value, and the surrounding waters serve as critical habitat for protected species. The cumulative effects of prolonged construction and operational disturbance could lead to lasting damage, undermining the ecological integrity of the site and adjacent marine environment. Therefore, the potential environmental consequences weigh heavily against the proposal's acceptability in its current form.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their submission constitutes a significant aspect of the application, acknowledging that, according to the applicant's own approach, Scottish Ministers may arrive at a different conclusion regarding potential adverse effects. This recognition underscores the applicant's awareness of the potential environmental impacts and their intent to address these through appropriate derogation provisions.

The evidence submitted in support of this application, including the applicant's own derogation documents, fails to demonstrate that the statutory tests designed to protect internationally important habitats and species can be met. This shortcoming is critical, as these tests are fundamental legal requirements intended to safeguard ecological features of international significance. Without clear and convincing

evidence that these criteria are satisfied, the basis for granting consent is substantially weakened.

Moreover, the applicant's documentation reveals a degree of uncertainty that further undermines confidence in compliance with these statutory protections. The presence of such uncertainty suggests that the potential impacts on protected habitats and species have not been adequately assessed or mitigated. This gap in the evidence and the lack of certainty effectively compromise the integrity of the application and its alignment with national and international conservation obligations.

In conclusion, the failure to satisfy the legal tests protecting internationally important ecological features is a decisive factor against the approval of this application. Given the paramount importance of these statutory safeguards, it would be inappropriate to grant consent in the absence of demonstrable compliance. Therefore, the application should be refused to ensure the continued protection of these vital natural assets.

1.1.929 Public Engagement, Site Selection and Environmental Information

While mitigation measures and future monitoring plans are proposed, reliance on these post-consent actions does not satisfy the fundamental requirement that likely significant environmental effects be fully understood prior to determination. The Environmental Impact Assessment submitted is the principal evidential basis for the Scottish Ministers' decision. However, the assessment falls short of sufficiency, despite its breadth. Key topics reveal significant shortcomings: the landscape assessment employs a methodology that does not support its conclusions, notably attributing outcomes to distance patterns absent from its own framework; the heritage assessment fails to demonstrate application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. By deferring critical elements to future approvals and monitoring, the applicant has not provided adequate environmental information. Consequently, the Scottish Ministers are unable to make an informed determination based on the evidence before them, as required by the EIA Regulations.

1.1.930 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. However, the application's assessment inadequately recognises Islay's role as an impacted island community, instead predominantly considering it as a potential project location. This approach fails to provide any place-based evaluation of the effects on Islay's Atlantic-facing communities, whose proximity to the development area inevitably influences their setting, local economy, and community life.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Notably, the North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this

community, suffers from the same deficiencies in the heritage assessment, particularly regarding the treatment of its open maritime setting. Consequently, the application's evaluation of environmental and heritage impacts on these islands is insufficiently robust and reliable.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, thereby compromising the overall accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly facing the development site, with extensive visibility and a large geographical extent of change spanning approximately 21 kilometres. The proposed turbines would extend across around 39 degrees of the horizon, affecting key views including the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, where the applicant concedes significant effects for residents and visitors, including those at Dùn Ì, the island's highest point. Importantly, Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—holds international heritage significance, closely tied to pilgrimage and maritime arrival. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment. Community concerns further underscore the impact; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential effect pathway that remains unassessed. To contextualise the scale, the largest proposed turbines would exceed the height of Ben Hynish on Tiree by approximately 194 metres, appearing substantially larger despite being at roughly two-thirds of the distance from Iona. These factors collectively demonstrate that the applicant's evaluation does not fully capture the significant and wide-ranging effects on Iona, undermining the robustness of the environmental and social impact conclusions.

The applicant's assessment fails to adequately address the significant visual and economic impacts on Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Although the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres, it is only attributed medium magnitude effects. The applicant concedes significant effects at Erraid and on the Core Paths of the Ross, as well as on Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors. This community is directly tied to visitor flows and would therefore experience substantial consequences. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. Notably, the Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is acknowledged as highly sensitive at distances between 21 and 33 kilometres, yet is assigned only medium magnitude impacts. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are downplayed due to viewing distances exceeding 30 kilometres, despite the evident scale of change. Crucially, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, its wildlife boat operations, or the accommodation sector in its western townships, all of which depend heavily on the Atlantic seascape that the

development would industrialise. This omission overlooks the practical consequence that these communities and their economic activities would be detrimentally affected by the proposed development.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, yet these evaluations appear to underestimate or omit significant impacts, particularly on vulnerable island communities and their natural and cultural qualities. Ulva, a community-owned island within this National Scenic Area, is at an early stage of regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva's community or landscape qualities has been provided, leaving a critical gap in understanding the full implications.

Staffa, situated within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the applicant's own assessment boundary, which extends to around 30 kilometres as advised by NatureScot for evaluating effects on National Scenic Area qualities. Despite recognising Staffa's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that does not fully account for the island's cultural and environmental importance.

Beyond these, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed with high sensitivity but assigned only medium to low magnitude of impact. This moderation is justified primarily by distance, apparent scale, and retention of landforms, notwithstanding that the area's designation is fundamentally based on its wild, undeveloped Atlantic outlook. Similarly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of approximately 35 to 40 kilometres, receive comparable treatment with limited recognition of potential adverse effects.

Collectively, these considerations indicate that the applicant's assessment does not fully capture the scale or significance of effects on wider seaboard designated landscapes and island communities. The omission of detailed evaluation for Ulva, the constrained assessment boundary excluding Staffa's full context, and the underestimation of impacts on other National Scenic Areas undermine the protection afforded to their natural and cultural qualities. Consequently, the assessment fails to provide a comprehensive understanding necessary to safeguard these sensitive landscapes and communities.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite acknowledging its High sensitivity at a distance of approximately 35 kilometres. This conclusion contrasts sharply with the recognised sensitivity of the site, suggesting that the proposed mitigation measures or distance-related factors may have been overestimated in their effectiveness. When compared with other assessments where similar distances and sensitivities have resulted in higher magnitude ratings, this discrepancy indicates an inconsistency that undermines the reliability of the applicant's evaluation.

Tiree's unique topography and landscape character further challenge the Low magnitude conclusion. As an exceptionally low-lying island dominated by expansive sea and sky, its highest elevation, Ben Hynish, reaches only 141 metres. The introduction of turbines up to 335 metres tall would represent vertical structures unprecedented in the island's seascape. Such prominent features would inevitably alter the visual and experiential qualities that define Tiree's character. The assessment's failure to adequately reflect this substantial alteration leads to a significant understatement of potential effects.

In light of these considerations, the applicant's evaluation appears to underestimate the magnitude of change and consequent impacts on Tiree's sensitive and distinctive landscape. This understatement raises concerns about the overall reliability of the assessment, warranting a more thorough and calibrated appraisal to ensure that the full extent of effects on this exposed and valued receptor is properly recognised and addressed.

The applicant's assessment applies a distance-based moderation to mitigate perceived effects on visual receptors, yet this approach is insufficient in addressing the specific circumstances of mainland and island communities directly facing the development. For example, Gigha, a community-owned island emblematic of island regeneration, lies to the east of the proposed site and depends heavily on its carefully balanced social and economic fabric. The absence of any examination of impacts upon Gigha's community and economy reveals a significant omission in the assessment, undermining its comprehensiveness. Similarly, Ardnamurchan Point, as the most westerly point of the British mainland, offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptor for which the applicant's distance-based mitigation is claimed, yet their significance is not adequately considered.

Furthermore, the west coast of Kintyre comprises a succession of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands, together with adjacent mainland coasts that have direct views toward the development area, share this reliance on the seascape. The failure to assess the effects on these interconnected communities and landscapes results in a substantial gap in understanding the full implications of the proposal. Without a detailed appraisal of these receptors, the assessment cannot be regarded as comprehensive or robust, and decision-making is consequently compromised.

There remains significant uncertainty regarding the applicant's approach to assessing impacts beyond 20 kilometres, which systematically moderates the magnitude of change and discounts effects on highly sensitive receptors at these distances. Taken together, the evidence demonstrates that where sensitive communities exist beyond this threshold, their experiences and the true extent of environmental effects have not been adequately evaluated through any place-based assessment. This methodological limitation fundamentally undermines the integrity and completeness of the environmental impact assessment, leaving a critical gap in understanding the full implications of the proposal.

1.1.931 Personal Observations

In addition to the planning matters above, I am personally concerned because: I no longer live in the Highlands but am a frequent visitor. I believe these plans would be an environmental disaster for the area, retracting from the beauty and diverse natural area for wildlife.

Finally, I would also ask the Scottish Ministers to consider: There are few naturally beautiful areas left in the UK. It would be disastrous to destroy this area. The national grid cannot accept anymore electric, so this would be directly sold to foreign countries therefore have no benefit to the local/ national economy.

1.1.932 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements, as demonstrated by the applicant's own evaluation. This assessment acknowledges considerable impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, subsequent scrutiny of the applicant's documentation reveals that these impacts have been consistently underestimated. Furthermore, the essential heritage assessment has not been undertaken, and although the adverse effects on the island communities within the project's vicinity were identified, they have never been subjected to a thorough evaluation. The ecological criteria necessary for approval have not been demonstrated as achievable, and notably, only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider granting approval, I request that they require the submission of further environmental information alongside enhanced visual representations. Additionally, I propose that the applications be determined only following a public inquiry, thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the ultimate decision, I further request that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 196
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, comprising applications 00012385 and 00012386. These seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited (ScottishPower Renewables). I request that this submission be recorded as an official objection, that I be registered accordingly, and that I am informed of the final determinations made on these applications.

The development in question involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning around 448 square kilometres. This site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the southern Hebrides islands and their coastal communities.

The following exposition details the grounds for objection, rooted firmly in the statutory and policy context governing the determination of these applications. It is incumbent upon the applicant to substantiate, through robust and comprehensive evidence, that all relevant statutory tests and planning policies are met. The onus does not lie with objectors to disprove the application. In this instance, the applicant has failed to meet that evidential burden, and accordingly, consent should be withheld.

1.1.933 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not show that the applicant has adequately addressed these requirements or taken reasonable steps to mitigate adverse effects on these protected interests. This omission is significant given the statutory obligation imposed both on the applicant and the Scottish Ministers in the determination process.

Furthermore, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory duties, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent. The application’s shortcomings in meeting these fundamental statutory requirements undermine its legitimacy and warrant refusal in accordance with the statutory mandate.

The marine licence application under consideration is required to be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and must comply with Scotland’s National Marine Plan unless relevant considerations indicate otherwise.

The statutory framework explicitly mandates adherence to a range of General Policies within the National Marine Plan, notably GEN 4 concerning Co-existence, GEN 6 and paragraphs 4.22 to 4.23 relating to the Historic Environment, GEN 7 and paragraph 4.28 addressing Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies collectively form an integral part of the statutory assessment process for the marine licence application.

However, the application fails to demonstrate compliance with these critical policies. The evidence before the determining authority identifies clear deficiencies and omissions in the applicant's submission, which fall short of the statutory requirements and the standards set out in the National Marine Plan. In particular, the absence of robust evidence addressing cumulative impacts and natural heritage concerns, as well as inadequate engagement and consideration of the historic environment and landscape designations, undermines the statutory assessment. These shortcomings constitute conflicts with the applicable legal and policy framework, which must be given substantial weight in the decision-making process.

Given these unresolved deficiencies and the failure to meet the statutory policy requirements, the application does not satisfy the conditions necessary for the granting of consent under the Marine (Scotland) Act 2010. The statutory guidance is unequivocal that where compliance has not been demonstrated, or where evidence reveals conflicts with the legal and policy framework, such matters weigh decisively against authorisation. Accordingly, the marine licence application should be refused on the grounds of non-compliance with the National Marine Plan and the Marine (Scotland) Act 2010.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 concerning Biodiversity, Policy 4 relating to Natural Places, Policy 7 addressing Historic Assets and Places, and Policy 11 on Energy. These policies establish clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural environments, the conservation of historic assets, and the responsible use of energy resources within development proposals.

However, the evidence presented fails to demonstrate compliance with these critical policies. There are identifiable deficiencies and omissions in the applicant's documentation that undermine the ability to confirm adherence to the biodiversity and natural places requirements set out in Policies 3 and 4. Similarly, the proposal does not adequately address the protection and management of historic assets as required by Policy 7, nor does it provide sufficient evidence to satisfy the energy considerations mandated by Policy 11. These shortcomings represent clear conflicts with the applicable legal and policy framework established by NPF4.

Given that compliance with these policies has not been demonstrated, and in light of the identified deficiencies and omissions, these matters weigh decisively against the granting of planning consent. The failure to meet the statutory and policy

requirements of NPF4 in relation to biodiversity, natural places, historic assets, and energy is a material planning consideration that must be afforded significant weight in the determination of this application. Consequently, the proposal should be refused on the basis that it conflicts with the fundamental provisions of the National Planning Framework 4.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This failure to provide an adequate environmental impact assessment undermines the decision-making process by leaving the determining authority without a comprehensive understanding of the potential environmental consequences. Without this essential information, the proposal cannot be properly evaluated against the legal and policy framework designed to protect the environment, thereby rendering any consent premature and procedurally flawed.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any evidence that these tests have been satisfactorily met, constitutes a significant omission that conflicts directly with the legal obligations imposed by the Habitats Regulations. Given that compliance has not been demonstrated and deficiencies remain unaddressed, these failures weigh decisively against the granting of consent. The proposal's shortcomings in meeting these critical environmental safeguards represent a fundamental breach of statutory duties and must result in refusal.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence confirms that this statutory obligation is clear and unequivocal, establishing a legal framework within which proposals affecting island communities must be assessed.

In this case, the proposal fails to properly consider or weigh the interests of island communities as required by the Act. There are evident deficiencies and omissions in the applicant's assessment, and no satisfactory demonstration that the statutory duty has been fulfilled. As the evidence states, where such compliance is not shown, or where conflicts with the applicable legal and policy framework arise, these matters must weigh against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not meet the statutory requirements of the Islands (Scotland) Act 2018.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted evidence does not adequately prove compliance with all applicable legal and policy frameworks. Furthermore, where compliance has not been demonstrated, or where the evidence

identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given these shortcomings, the application does not satisfy the necessary requirements to justify approval.

1.1.934 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is conditional upon compliance with the policy's own impact criteria. These criteria include Policy 11(c), which addresses impacts on communities, as well as Policies 11(d) and 11(e), which concern impacts on landscape, seascape, and other receptors. The policy framework therefore requires that renewable energy proposals must not only contribute to energy goals but must also satisfactorily mitigate or avoid adverse effects on these key considerations.

In the case of the current proposal, it fails to meet these essential impact criteria. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting with Policies 11(d) and 11(e). Furthermore, there is no clear demonstration that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded in line with Policy 11(c). Additionally, the ecological tests required by the policy have not been shown to be met based on the submitted evidence. Consequently, the proposal is not consistent with the impact criteria set out in NPF4 Policy 11, undermining the policy's support for renewable energy development in this instance.

The proposal must be assessed in the context of several interrelated policies within NPF4 that collectively seek to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 functions alongside Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities. Furthermore, Policy 7 addresses the protection of scheduled monuments, particularly through Policy 7(h), and includes provisions concerning the settings of historic assets under Policies 7(c) and 7(d). Policy 3 complements these protections by establishing requirements for the conservation and enhancement of biodiversity.

In light of the evidence presented, the proposal conflicts with these critical policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities for which these areas are protected. Moreover, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. There is also a failure to show that island communities, which often rely on the integrity of their natural and historic environments, would be adequately safeguarded by the development. This lack of demonstration raises substantial concerns regarding compliance with the policies aimed at heritage and community protection.

Finally, the ecological requirements set out under Policy 3 have not been evidenced as being capable of fulfillment based on the materials submitted. Without convincing evidence that the ecological tests can be met, the proposal remains contrary to the biodiversity objectives enshrined in NPF4. Taken together, these shortcomings

indicate that the proposal does not comply with the suite of policies designed to protect designated assets at the national level, and as such, the proposal should be reconsidered in light of these significant policy conflicts.

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, resulting in adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This inconsistency undermines the objectives of the development plan, which seeks to safeguard these key local attributes. Furthermore, the proposal is not only at odds with the local development plan but also fails to align with the broader strategic aims set out in National Planning Framework 4. The applicant has not provided evidence to demonstrate that these conflicts can be mitigated or justified. Consequently, the proposal is fundamentally incompatible with the relevant terrestrial development plan policies.

1.1.935 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Despite this omission, a comprehensive Evidence Note prepared in support of community objections—based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3—demonstrates a consistent pattern across all three assessment streams. Specifically, no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which indicates that at viewing distances exceeding 30 kilometres, the scale of change is judged to be small, and that the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This implicit reliance on distance in moderating effect magnitude has significant implications for the accuracy of the applicant's conclusions. When magnitude is systematically reduced at distances coinciding with the location of the most sensitive designated landscapes, the input data feeding into the protective tests are understated. Consequently, the findings presented do not provide a reliable description of the potential effects that the Scottish Ministers are being asked to consent to. This undermines the robustness of the assessment and calls into question whether the full extent of landscape and visual impacts has been appropriately considered.

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that stakeholders and decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape, which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.936 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate that the integrity of setting for historic assets has been properly evaluated, undermining confidence in its conclusions regarding heritage impacts. Although the applicant adopts Historic

Environment Scotland's established methodology—which mandates an evaluation of whether changes to setting affect its contribution to cultural significance and whether setting integrity is maintained—the assessment relies predominantly on descriptions of visual change rather than the required evaluative analysis. A Methodological Audit, conducted using the applicant's own Appendix 14.3, reveals that while heritage attributes are identified and factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation are discussed, the critical step of assessing the integrity of setting in accordance with the accepted methodology is absent. This omission means that the conclusion asserting adequate retention of setting integrity is unsupported by the necessary methodological rigor, calling into question the reliability of the applicant's heritage impact findings.

While the applicant has sought to mitigate heritage impacts through various measures, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that underpin the significance of the affected assets. The applicant's own baseline acknowledges that the heritage significance is not confined to discrete monuments or static views but is deeply rooted in dynamic qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This understanding underscores the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced through movement rather than from fixed viewpoints.

In this context, the applicant's assessment may not fully capture the extent of these wider cultural qualities. Historic Environment Scotland, in their consultation responses documented within the application, requested additional viewpoints to ensure that these experiential and landscape relationships are properly represented. This suggests that the initial assessment might have been limited in scope, potentially overlooking key aspects of cultural significance that contribute to the heritage assets' value.

Therefore, while mitigation efforts are acknowledged, there remains a concern that without a comprehensive representation of these broader cultural and experiential elements, the heritage impact assessment risks underestimating the true significance of the site. It would be prudent for the assessment to incorporate these wider perspectives to inform more effective and sensitive heritage protection measures.

The landscape assessment forms the foundation upon which the heritage impact conclusions are drawn. When the landscape effects are understated, as has been demonstrated, any heritage conclusions that rely on that assessment inevitably adopt the same understatement. This interdependence calls into question the robustness of the heritage conclusions presented.

Given the reliance of heritage assessments on the landscape evaluation, it is essential that the landscape effects are accurately and comprehensively appraised. Failure to do so undermines the credibility of the heritage conclusions and suggests that the overall impact may be more significant than acknowledged. Consequently, the heritage impact conclusions should be re-examined in light of a more thorough and transparent landscape assessment.

The application falls short in providing adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, the applicant has not supplied the necessary assessments or evidence demonstrating that these values will be safeguarded. This absence of detailed evaluation contrasts unfavourably with the expectations of comprehensive heritage protection embedded within the relevant policy framework.

In addition, the application does not align with the provisions of GEN 6 nor paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the need for rigorous protection of heritage assets within marine planning contexts. Given that the Scottish Ministers lack before them any conclusive assessment addressing these concerns, the proposal fails to meet key policy requirements. Consequently, the application cannot be considered acceptable in respect of heritage asset protection.

1.1.937 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

The applicant's socio-economic assessment fails to adequately address the specific vulnerabilities of the island communities potentially affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway through which impacts could manifest, no targeted assessment of the habitability of these islands was undertaken. Instead, the analysis in Chapter 18 focuses predominantly on regional dynamics, providing detailed scrutiny of port communities but neglecting an equivalent place-based evaluation of the island settlements facing the development. This methodological approach leads to the unsupported conclusion that these island communities have low sensitivity to tourism-related effects, a finding that lacks empirical foundation given the absence of direct, localized investigation.

The inadequacy of this assessment is further underscored by the economic characteristics of small island communities, which are not accurately represented by regional averages. Their economies are highly concentrated in sectors that are directly dependent on the attributes attracting visitors, meaning that any degradation of these qualities would disproportionately affect them. Far from mitigating sensitivity, a reliance on increasing visitor numbers intensifies the communities' dependence on

the very conditions that may be compromised by the proposal. Therefore, the conclusion of low sensitivity without detailed, place-specific analysis is not a demonstration supported by evidence but rather an unsubstantiated assumption. This fundamental flaw in the applicant's methodology significantly undermines confidence in the socio-economic assessment and the adequacy of proposed mitigation measures for island communities.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, it conflicts with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which impose a duty to assess and give due weight to the interests of island communities through meaningful engagement from the earliest stages of the proposal to its conclusion. Although the applicant acknowledged the need for particular scrutiny of island communities, no adequate assessment has been undertaken to understand the potential impacts on them. Consequently, it remains unproven that the proposal aligns with the principles of sustaining island communities, and the statutory responsibilities owed to these communities have not been fulfilled. Therefore, the proposal cannot be regarded as compliant with the necessary planning and statutory standards for the protection and support of island communities.

1.1.938 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The very inclusion of

such materials within the application highlights the applicant's recognition of potential impacts on designated environmental interests.

It is important to note that the submission of these derogation and compensation documents indicates a precautionary approach by the applicant, acknowledging that the proposed development may affect the protected guillemot population. By providing these plans, the applicant seeks to demonstrate a commitment to mitigating any such impacts should the competent authority, in this case the Scottish Ministers, determine that an adverse effect on site integrity cannot be ruled out. This approach reflects an understanding that the Scottish Ministers may reach a different conclusion regarding the potential for harm than the applicant has presented.

The presence of these documents as part of the application is therefore a significant feature, as it signals preparedness to address and manage any identified adverse effects through derogation provisions and compensatory measures. This submission aims to ensure that, in the event of an adverse effect being confirmed, appropriate steps will be taken to protect the guillemot population and maintain the overall integrity of the North Colonsay and Western Cliffs Special Protection Area.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has determined that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is imperative that no reasonable scientific doubt remains regarding the absence of adverse effects. This high evidential standard places the onus firmly on the applicant to demonstrate compliance; importantly, proposed mitigation, compensation measures, or future monitoring cannot, in isolation, substantiate that the statutory tests have been fulfilled. This legal framework is reinforced by the provisions of the Habitats Regulations, alongside GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Consequently, any planning consent must be underpinned by robust, conclusive evidence to satisfy these overlapping statutory and policy requirements.

The evidence submitted in support of this application, including the applicant's own derogation documents, fails to demonstrate that the statutory tests designed to protect internationally important habitats and species can be met. This shortcoming is critical, as these tests are fundamental legal requirements intended to safeguard ecological features of international significance. Without clear and convincing evidence that these criteria are satisfied, the basis for granting consent is substantially weakened.

Moreover, the applicant's documentation reveals a degree of uncertainty that further undermines confidence in compliance with these statutory protections. The presence of such uncertainty suggests that the potential impacts on protected habitats and species have not been adequately assessed or mitigated. This gap in the evidence and the lack of certainty effectively compromise the integrity of the application and its alignment with national and international conservation obligations.

In conclusion, the failure to satisfy the legal tests protecting internationally important ecological features is a decisive factor against the approval of this application. Given

the paramount importance of these statutory safeguards, it would be inappropriate to grant consent in the absence of demonstrable compliance. Therefore, the application should be refused to ensure the continued protection of these vital natural assets.

1.1.939 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposed development, alongside other existing, consented, and foreseeable projects, are significantly underestimated. This underestimation arises directly from the baseline conditions established in the Environmental Impact Assessment, which have been shown to understate the effects on landscape, heritage, and socio-economic factors. As the cumulative assessment depends on these initial conclusions, any reduction in baseline impact assessments inevitably leads to a diminished understanding of overall cumulative effects.

Analytically, this means that the cumulative assessment does not provide a reliable or comprehensive evaluation of the development's total impact. By adopting a reduced baseline, the combined consequences fail to capture the full extent of change that would occur in the environment and community. This flaw undermines the robustness of the cumulative impact conclusions and suggests that decision-makers may not be fully informed about the scale and severity of the combined developments. Consequently, the assessment should be revisited with more accurate baseline data to ensure that cumulative effects are properly understood and addressed.

While mitigation measures have been proposed, they fail to address a fundamental procedural deficiency concerning project splitting and the assessment of cumulative

effects. The applicant has not satisfactorily demonstrated compliance with GEN 21 and paragraph 4.85 of the National Marine Plan, nor with NPF4 Policy 11(e), all of which explicitly require comprehensive evaluation of cumulative and in-combination effects. Furthermore, the requirements of the Environmental Impact Assessment Regulations in relation to project splitting have not been met. This omission means that the cumulative impacts of the proposal and the overall effects of the project, including any deferred works, have not been reliably identified or assessed. It is therefore essential that the decision-making process explicitly considers the treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.940 Public Engagement, Site Selection and Environmental Information

The applicant's submission underscores the critical importance of public participation in the site-selection process, emphasising that the weight the Scottish Ministers are asked to place on this process renders the quality of such participation directly material. Notably, deficiencies identified during both the plan and site-selection stages have persisted into the application phase. The application itself is substantial, comprising many thousands of pages of technical documentation. However, the consultation period allocated for public response has coincided with the busiest months of the year for the island communities concerned. During this time, residents are engaged continuously in the visitor season, limiting their capacity to engage fully. Furthermore, specialist advice—a vital resource for informed participation—is least available in this period. This imbalance is further accentuated by the applicant's advantage, having had years to prepare the case with considerable professional and financial resources, creating a disparity in the ability of affected parties to participate effectively.

In this context, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish a clear expectation that those affected by decisions of such magnitude must have a realistic opportunity to engage meaningfully. The conditions under which the island communities have been required to respond, however, fall short of these standards. This shortfall undermines the legitimacy and fairness of the consultation process and, by extension, the site-selection process as a whole. It is therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

The environmental information presented within the application falls short of the standards required for a thorough Environmental Impact Assessment (EIA), particularly when compared to the robust evidence necessary to inform Scottish Ministers' decisions effectively. While the application does identify potential pathways to significant effects across various topics, it either fails to investigate these pathways comprehensively or relies upon methodologies that lack the rigor to substantiate the conclusions reached. For example, the landscape assessment produces outcomes based on a distance pattern absent from its own methodology, the heritage assessment does not evidence the application of its prescribed integrity test, and the socio-economic assessment omits a place-based analysis of the affected islands. Such deficiencies undermine the reliability of the environmental

evidence and distinguish it unfavourably from the standards of sufficiency required by the EIA Regulations.

Furthermore, the application frequently depends on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals to address outstanding environmental concerns. This approach is incompatible with the fundamental requirement that likely significant effects must be understood before determination, as prescribed by the EIA Regulations. Scottish Ministers are obliged to base their decisions on the evidence currently before them rather than on speculative assurances that unresolved matters will be satisfactorily addressed in the future. Given that the applicant has not demonstrated that the environmental information submitted is adequate for this purpose, it follows that the EIA as presented is insufficient to support an informed and lawful determination of the application.

1.1.941 Effects on Local Area

While the applicant proposes mitigation and compensation measures aimed at protected species and heritage assets, these do not adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Islay and Colonsay, being the closest islands to the development area—which lies immediately north-west of Islay and west of Colonsay—are insufficiently assessed in the application. The assessment treats Islay primarily as a potential project location rather than recognising it as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay face the nearest edge of the 448 square kilometre development area, yet no place-based evaluation has been undertaken to consider the impacts on their setting, economy, or community life.

Furthermore, for Colonsay and Oronsay, the development directly confronts the seaward outlook that is integral to daily life. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay’s coastline, is central to the applicant’s derogation case and compensation strategy. This represents the clearest acknowledgement within the application that harm to the internationally protected seabird populations inhabiting these cliffs cannot be ruled out. In addition, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly regarding the treatment of its open maritime setting.

Taken together, these deficiencies demonstrate that the applicant’s environmental and heritage impact evaluation lacks the necessary reliability and thoroughness, leaving the effects on these island communities and their valued assets underassessed and insufficiently mitigated.

The practical consequence of the applicant’s assessment is that it underestimates the scale and significance of the impacts on Iona’s visual environment, community, and heritage assets, thereby compromising the accuracy of the overall environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the proposed development across a large geographical area of approximately 21

kilometres. The turbines would extend across roughly 39 degrees of the horizon, directly affecting the ferry crossing between Fionnphort and Iona. The West Coast of Iona is similarly highly sensitive, with widespread visibility of the turbines and acknowledged significant effects for residents and visitors, including at Dùn Ì, the island's highest point. Such extensive visual influence is further emphasised when comparing the turbines to a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at 33 kilometres; the proposed turbines would exceed this height by approximately 194 metres, at around two-thirds of that distance, indicating a much more dominant visual presence than has been conveyed.

In addition to visual effects, the applicant's assessment fails to adequately account for impacts on Iona's internationally important monastic landscape, including the Abbey, the Nunnery, and the high crosses, whose significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the surrounding landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location critical to understanding the heritage context. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting widespread local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on this community, yet no assessment of this impact has been undertaken. Taken together, these omissions and underestimations call into question the reliability of the applicant's environmental and social impact conclusions with respect to Iona.

The applicant's assessment acknowledges significant effects on several key locations within Mull and the Ross of Mull coastal communities. Specifically, the Ross of Mull South coastal area is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with an attributed Medium magnitude of effect. Significant impacts are recognised at Erraid and on the Core Paths of the Ross, while Fionnphort, serving as the gateway to Iona and the principal embarkation point for visitors, is explicitly accepted to experience significant effects. This community is notably reliant on the flow of visitors, highlighting the importance of understanding the development's influence on local dynamics.

Further across Mull, the applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres. However, the magnitude of impact in this nationally designated landscape is attributed no more than Medium. This suggests a potential underestimation of the development's visual and environmental intrusion within an area of recognised scenic importance. The applicant's approach appears to downplay the extent of change, especially given the acknowledged sensitivity.

The assessment's treatment of the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Here, the applicant judges the scale of change to be small due to a viewing distance exceeding 30 kilometres. This distance-based reasoning raises questions about the adequacy of the impact evaluation, particularly

given that Mull's west-facing tourism economy, wildlife boat operations, and accommodation in western townships are intimately linked to the Atlantic seascape that would be industrialised by the development. Importantly, none of these communities have received a place-based assessment tailored to their specific contexts, which risks overlooking significant economic and social consequences. Taken together, these points suggest that the applicant's assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities.

The applicant's assessment recognises potential effects on several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses Ulva and Staffa. Ulva, a community-owned island undergoing regeneration, is acknowledged as sharing fully in the effects on this designated landscape. However, the assessment notably omits a dedicated evaluation of Ulva itself, despite its reliance on the very qualities of setting and unspoilt seascape that the development could compromise. Staffa, situated approximately 35 kilometres from the development zone, lies beyond the 30-kilometre threshold set by NatureScot for assessing National Scenic Area effects. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, notwithstanding its own recognition of the island's panoramic maritime qualities.

Further afield, the Jura National Scenic Area, located around 28 to 32 kilometres from the site, is assessed as having high sensitivity but is attributed only a medium to low magnitude of effect. This moderation is justified by the applicant on the basis of distance, apparent scale, and retained landforms. Yet Jura's designation fundamentally depends on its wild and undeveloped Atlantic outlook, which may be more vulnerable to change than the assessment suggests. Similarly, the Scarba, Lunga and the Garvellachs National Scenic Area, some 35 to 40 kilometres distant, receives a comparable appraisal, potentially underestimating the significance of effects on these seascapes.

Overall, while the applicant's evidence addresses a range of designated landscapes, it appears to underestimate or omit significant effects on key locations, particularly those with vulnerable communities and distinctive natural and cultural qualities. This raises concerns about the adequacy of the assessment in safeguarding the integrity of these important seaboard landscapes and island communities. Further, more detailed consideration may be necessary to ensure the full implications for these sensitive areas are properly understood and mitigated.

The applicant's assessment assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true extent of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its entire landscape defined by the dominance of sea and sky. Its highest point, Ben Hynish, reaches only 141 metres, and the island's character relies heavily on an open oceanic horizon. Introducing turbines up to 335 metres in height would present vertical structures unprecedented in the seascape. Given this exposure and sensitivity, the conclusion of a Low magnitude of change fails to capture the

substantial visual and character effects, leading to an unreliable overall assessment of impact on this receptor.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

There remains significant uncertainty regarding the applicant's approach to assessing impacts beyond 20 kilometres, which systematically moderates the magnitude of change and discounts effects on highly sensitive receptors at these distances. Taken together, the evidence demonstrates that where sensitive communities exist beyond this threshold, their experiences and the true extent of environmental effects have not been adequately evaluated through any place-based assessment. This methodological limitation fundamentally undermines the integrity and completeness of the environmental impact assessment, leaving a critical gap in understanding the full implications of the proposal.

1.1.942 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited Iona most years since age 4 and have much love for the island, its surroundings, the inhabitants, the wildlife etc. The negative impact of this proposed project is widespread and is felt among all those with connections to the island. Iona and its surroundings are an important place of peace and safety for many including the wild and sea life, to disturb that would cause unmeasurable and irreversible harm. Whilst the proposal is in breach of many different rules and regulations, it also breaches our moral and ethical duty to protect this sacred space for all that dwell in the space that do not have a voice to object themselves.

Based on my own local knowledge, I also wish to highlight that: All of it, this has been so poorly thought through and it is inherently flawed

Finally, I would also ask the Scottish Ministers to consider: That there is no benefit to this that outweighs the negative impact it will have. I am angry to share the earth with people that would suggest proposing such monstrosity

1.1.943 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its assessment. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while the effects on the island communities within the project's sphere have been identified, no formal assessment of these impacts has been undertaken. Furthermore, the ecological criteria required by law have not been shown to be met. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for determination.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of additional environmental information and enhanced visualisations. Moreover, I propose that the applications be subject to determination only after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, I further seek a clear statement of the Ministers' conclusions on the effects on cultural heritage and the impacted island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 197
Dear Sir/Madam,

I hereby register my formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, put forward by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails constructing an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would encompass between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. The site is located within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea situated north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in detailed planning and environmental considerations, evaluated within the relevant statutory and policy frameworks that govern these applications. It is important to emphasise that the responsibility lies entirely with the applicant to provide sufficient evidence demonstrating that all relevant statutory and policy tests have been met. Objectors, such as myself, are not required to prove the contrary. Upon careful review, it is apparent that the applicant has failed to discharge this burden adequately. Consequently, the applications should be refused consent. I request that I be formally recorded as an objector and informed of the outcome of the decision-making process.

1.1.944 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, relying solely on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern across all three assessment streams. This pattern shows that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation directly stems from the applicant’s own documents, which acknowledge the influence of distance on their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis within the applicant’s materials describes a High magnitude of effect within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond around 30 kilometres for some landscape types.

This approach has significant implications for the reliability of the assessment’s conclusions. By systematically moderating magnitude at distances where some of the most sensitive designated landscapes are located, the protective tests applied rely on understated input values. Consequently, the conclusions drawn do not provide a robust or accurate description of the effects upon which Scottish Ministers

are being asked to base their consent decisions. This methodological limitation undermines the assessment's capacity to fully capture and convey the potential landscape and visual impacts at critical receptor locations beyond the stated distance thresholds.

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance. This guidance explicitly acknowledges inherent limitations in such materials, noting that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, wireline drawings included within the same panoramic projections share these constraints; they represent technical renderings that accompany the photographic evidence rather than serve as independent corrections or enhancements. Consequently, while these visualisations provide a useful reference, their ability to convey the true visual impact of the development is inherently restricted. This limitation should be carefully considered when assessing the overall visual effects, as reliance solely on these materials may understate the experiential scale and presence of the proposed scheme.

While mitigation measures are often proposed to reduce the visual impact of offshore developments, in this instance the introduction of aviation and navigation lighting would mark a permanent and significant alteration to the night-time seascape. The existing horizon currently lacks any such lighting, and the proposed illumination would be visible throughout the stated 35-year operational life of the development. This change is not merely temporary; the presence of artificial lighting on the sea horizon would fundamentally transform the character of the seascape during nighttime hours, diminishing its natural qualities.

Moreover, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Granting consent for the development effectively designates this seascape as appropriate for wind farm use, thereby endorsing a permanent shift in its character. Such a decision carries weight beyond the operational lifespan, as it signals acceptance of the seascape's alteration and the associated lighting effects. In light of these considerations, the impact on night-time seascape character and lighting should be regarded as a significant factor weighing against approval.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.945 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the proposed development's impact on the setting of historic assets does not fully comply with the recognised methodology established by

Historic Environment Scotland. While the applicant claims to have adopted this methodology, which necessitates evaluating whether changes to setting affect its contribution to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained, the assessment fails to demonstrate this critical evaluative step. Notably, the methodology explicitly states that visual change should not be directly equated with adverse impact, yet the applicant's analysis appears to overlook this distinction.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, reveals that although the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The Audit finds that the assessment merely describes visual changes and then asserts that the integrity of setting is adequately retained without providing the necessary evaluative reasoning. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness of the assessment overall.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The applicant's evidence acknowledges that the heritage conclusions presented rely substantially on the findings of the landscape assessment. It is expressly recognised that any understatement of landscape effects, as previously identified, directly influences the accuracy and reliability of the heritage impact conclusions drawn from those findings. This interdependency signifies that deficiencies in the landscape assessment cannot be isolated but instead permeate the entire evaluation of heritage effects.

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and

suggests that the overall assessment may not adequately reflect the true scale of harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.946 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

In considering the adequacy of the applicant's socio-economic assessment of impacts on island communities, it is instructive to compare the thoroughness of the analysis applied to port communities with that directed towards the islands themselves. The assessment in Chapter 18 offers a detailed examination of potential effects on port communities, reflecting a place-based approach that acknowledges their particular circumstances. However, this level of scrutiny is not extended to the island communities directly facing the development, where the assessment remains at a broad regional scale. This inconsistency raises concerns about the reliability of the conclusions drawn, particularly regarding the sensitivity of island communities to tourism-related changes.

The applicant's own consultants highlight habitability as a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the islands was conducted. Instead, the socio-economic evaluation concludes that the island communities

exhibit low sensitivity to tourism effects, a determination reached without any place-based analysis. Such an approach overlooks the distinctive characteristics of small island economies, which are markedly different from regional averages. These economies are heavily reliant on sectors that are directly influenced by the qualities attracting visitors. Consequently, increasing visitor numbers do not mitigate sensitivity; rather, they amplify the communities' dependence on attributes that may be vulnerable to change.

Given these considerations, the conclusion of low sensitivity for island communities appears unfounded and is better characterised as an assumption rather than evidence-based. The absence of a tailored, place-specific socio-economic assessment undermines confidence in the applicant's methodology and its capacity to understand or mitigate impacts on island communities adequately. It would be prudent for the assessment to incorporate detailed, island-focused analysis to ensure that the particular vulnerabilities and dependencies of these communities are fully recognised and addressed in the planning process.

The proposal fails to meet the required planning and statutory standards in relation to island communities, as it does not provide the necessary assessment or mitigation measures to address their specific socio-economic circumstances. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be carefully evaluated and afforded appropriate weight, supported by meaningful engagement throughout the planning process. In this context, the proposal's lack of comprehensive assessment undermines its compliance with these policy and statutory requirements.

Moreover, the applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary evaluation to understand the potential effects on them. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Consequently, the proposal falls short of the established legal and planning frameworks designed to protect island communities, rendering it unacceptable in its current form.

1.1.947 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These

documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

The applicant's evidence establishes that, under the Habitats Regulations, development consent may only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are satisfied. This places a high evidential burden on the applicant to demonstrate the absence of adverse effects; mitigation, compensation measures, and future monitoring alone cannot satisfy the statutory requirements. This legal framework is supported by the provisions of GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Taken together, these policies and regulations emphasize a stringent and precautionary approach to development affecting protected habitats and species. Consequently, any consent must be based on robust, conclusive scientific evidence meeting this exacting standard.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including

the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.948 Effects on Local Area

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, but it appears to

underestimate or overlook key impacts on these sensitive locations. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the outset of its regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva has been undertaken, which is a significant omission given the island's reliance on these natural qualities for its social and cultural revival. Similarly, Staffa, one of Europe's most celebrated small islands within the same National Scenic Area and located approximately 35 kilometres from the development site, falls outside the applicant's assessment boundary of 30 kilometres recommended by NatureScot. Despite acknowledging Staffa's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effects not significant, a position that fails to fully account for the island's celebrated status and the sensitivity of its landscape.

Further concerns arise from the treatment of the Jura National Scenic Area, positioned roughly 28 to 32 kilometres from the development, where the applicant assigns a High sensitivity but limits the magnitude of impact to Medium to Low on the basis of distance, apparent scale, and retained landforms. This assessment appears insufficient, given that the designation of Jura's landscape rests fundamentally on its wild and undeveloped Atlantic outlook, which could be compromised by the proposed development. A similar approach is taken towards the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receiving the same calibrated assessment despite its sensitive status. Taken together, these evaluations suggest a pattern of underestimating or omitting significant effects on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. This calls into question the robustness of the applicant's assessment and indicates a need for a more comprehensive and sensitive evaluation of the wider seaboard impacts.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental

impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.949 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am an American, who has been coming to Iona for several years, bringing groups of pilgrims who long to see this sacred land and experience its unique aliveness. The thing that people prize most is Iona‘s untouched nature, it’s lack of cars, it’s sense of removal from the world. This is a large part of what makes Iona the tourist destination that it is. For many it is a sacred site. The presence of industrial infrastructure, both visually and practically speaking will destroy that completely. While I recognize the value and importance of renewable energy, to sacrifice this highly prized sacred land for this purpose would be irreversible and, I believe, morally wrong.

1.1.950 Summary

The proposal for the MachairWind Offshore Wind Farm has failed to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, independent analyses of the applicant’s documentation reveal that these effects have been underestimated, and crucially, the necessary heritage assessment has not been conducted. Furthermore, while the proposal identifies potential impacts on the island communities affected, no assessment of these effects has been undertaken. In addition, the ecological requirements associated with the project have not been shown to be capable of being satisfied. It is also pertinent to note that only a portion of the entire project is currently submitted for consideration by the Scottish Ministers.

In light of these substantial shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the accompanying marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should be deferred until a public inquiry is held, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the ultimate decision, it is further requested that the Ministers provide explicit conclusions within their reasoned decision regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 198
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) for the MachairWind Offshore Wind Farm, referenced under application numbers 00012385 and 00012386. These applications request consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this objection be formally recorded, that I be registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals envisage the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. The development would involve between 91 and 144 wind turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning approximately 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated against the applicable statutory and policy frameworks guiding the determination of these applications. It is important to emphasise that the evidential responsibility lies with the applicant, who must demonstrate—through robust and sufficient evidence—that all relevant statutory tests and policy criteria are met. Objectors are not obliged to prove the contrary. In this case, for the reasons detailed below, the applicant has failed to satisfy this burden of proof, and therefore, the applications should be refused.

1.1.951 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable

description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

The visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

When considering the impact of the proposed development on the night-time seascape, it is important first to evaluate the potential for mitigation of lighting effects. Aviation and navigation lighting, as proposed, would introduce permanent illumination to an area of sea horizon currently devoid of such lighting. This unlit character is a defining feature of the existing night-time seascape and contributes significantly to its visual and experiential qualities. Mitigation measures may reduce some direct glare or light spill, but the fundamental alteration of the seascape's character due to the presence of fixed lights cannot be fully eliminated.

The proposal would result in the continuous presence of aviation and navigation lighting over a stated operational life of 35 years. This duration, while finite, represents a substantial period during which the seascape would be irrevocably changed. It should be noted that, from a policy perspective, this temporal limit does not negate the harm caused. The decision to grant consent effectively endorses the suitability of this seascape for wind farm use, including the acceptance of lighting impacts as an inherent consequence.

In balancing these considerations, it is clear that while mitigation may lessen some adverse effects, the permanent introduction of night-time lighting fundamentally transforms the character of the seascape. This transformation carries significant weight in the planning balance, requiring careful reflection on the acceptability of such change within the wider policy context.

There remains significant uncertainty regarding the assessment of the proposal's effects on landscape and seascape interests. The applicant has failed to adequately demonstrate that its conclusions on the scale of these effects align with the

methodology it has employed. This raises questions about the reliability of the impact evaluation and undermines confidence in the overall assessment.

Moreover, this lack of clarity has direct implications for compliance with established planning policies. The proposal does not satisfy the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, all of which are designed to safeguard nationally important landscapes and seascapes. Without clear evidence of adherence to these policies, the proposal cannot be considered consistent with the statutory framework protecting these valued environments.

1.1.952 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the applicant's adherence to the established methodology for assessing effects on the setting of historic assets, which calls into question the reliability of their conclusions about heritage impacts. While the applicant states that they have adopted Historic Environment Scotland's recognised methodology—developed through consultation and requiring an evaluation of how changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—this process is not clearly demonstrated. The methodology explicitly cautions against equating visual change directly with adverse impact. However, a published Methodological Audit, based solely on the applicant's Appendix 14.3, identifies that although the assessment acknowledges relevant heritage attributes and describes visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to show how the integrity of setting has been evaluated in line with the accepted methodology. Crucially, the necessary evaluative step that distinguishes mere description from a robust assessment of integrity is absent across all examined examples. This omission undermines confidence in the assessment's conclusions that the integrity of setting is adequately retained.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of

heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The applicant's submission fails to demonstrate compliance with key heritage protection policies, notably NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the cultural significance of internationally and nationally important heritage assets and their settings has not been adequately assessed or shown to be protected. Consequently, the Scottish Ministers do not have before them the necessary assessment to support a conclusion that these heritage assets would be safeguarded, undermining the acceptability of the application.

1.1.953 Effects on Island Communities, Tourism and the Local Economy

Mitigation measures proposed in support of the development fail to adequately address the fundamental reliance of the island communities on the qualities that attract visitors. While attempts may be made to reduce direct environmental impacts, such efforts cannot compensate for the profound alteration to the landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the islands' appeal. The applicant's own baseline assessments confirm these attributes as key visitor draws, yet the proposal would inevitably diminish them in ways that cannot be fully mitigated.

This dependence is exceptional and integral to the economic and social sustainability of the island communities. Any adverse change to these visitor-attracting qualities strikes at the very economic base of these communities, undermining not only local services and employment but also population retention and overall community viability. The proposal therefore presents a significant threat to the long-term sustainability of the islands, a risk that cannot be offset by partial mitigation measures.

The applicant's socio-economic assessment fails to provide an adequate basis for mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.954 Ecology, Biodiversity and Habitats Regulations

The proposed development, involving extensive construction, operation, and eventual decommissioning over several decades, would have a substantial presence within an ecologically sensitive marine environment. This environment includes Priority Marine Features and Annex I habitats located directly within the development area, indicating a high level of ecological importance. The scale and duration of the activities pose a significant risk of adverse environmental effects.

Surrounding the development site, the waters support a diverse range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for critical life processes, and disruption could lead to detrimental impacts on their populations and the wider ecosystem. The introduction of large-scale industrial activity threatens the integrity of these habitats and the species they support.

Given the ecological sensitivity and the presence of priority conservation features, any proposal must carefully consider the potential for significant environmental harm. Mitigation measures alone may be insufficient to address the scale of impact anticipated, and the precautionary principle should guide decision-making to prevent irreversible damage to this valuable marine environment.

The practical consequence of the applicant's submission is that there is an acknowledged risk of adverse effects on a protected site, specifically the North Colonsay and Western Cliffs Special Protection Area, which supports a significant guillemot population. By providing a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, the applicant signals an awareness that the project could impact the integrity of this designated area. This recognition is crucial, as it frames the application within the context of potential environmental harm that requires careful consideration.

These documents are not standard procedural submissions; they are specifically prepared for circumstances where adverse effects cannot be ruled out. Their presence in the application package demonstrates that the applicant is seeking to address these impacts through derogation provisions, which are legal mechanisms allowing certain activities that might otherwise be prohibited due to their environmental consequences. The compensation plan, targeted at the guillemot population, reflects an effort to mitigate potential ecological damage, underscoring the applicant's intention to manage and reduce harm to protected species.

Nevertheless, it is important to note that the applicant's own approach acknowledges a degree of uncertainty, as the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or significance of adverse effects. This uncertainty reinforces the need for a rigorous and cautious assessment process. The submission of these documents, therefore, constitutes a significant aspect of the application and warrants thorough scrutiny to ensure that the integrity of the protected site is safeguarded in accordance with relevant policies and statutory obligations.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where

applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

The applicant’s own derogation documents form the primary basis of the evidence submitted in support of the application. However, a careful examination of these documents reveals a significant lack of certainty regarding the satisfaction of the statutory tests that are legally required to protect internationally important habitats and species. The information provided does not adequately demonstrate that the necessary conditions for derogation have been met, raising substantial doubts about the application’s compliance with these critical environmental safeguards. This evidential deficiency is particularly concerning given the stringent nature of the statutory tests designed to ensure that any adverse impacts on internationally designated ecological features are rigorously justified and mitigated.

Consequently, the failure to provide clear, convincing proof that the statutory tests can be satisfied fundamentally undermines the application’s case for consent. Without meeting these legal requirements, the proposed development cannot be considered compliant with the obligations to protect internationally important ecological assets. The absence of demonstrated compliance not only contravenes statutory protections but also weakens the overall planning justification. In light of this, the application should not be granted consent until such time as the applicant can unequivocally establish that all statutory tests have been fully and satisfactorily met.

1.1.955 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it fragments the project by deferring critical elements, thereby preventing a comprehensive evaluation of its overall impacts. Only part of the project—the wind farm itself—is before the Scottish Ministers, while essential components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are reserved for later applications. This segmentation means that the effects of the entire project are never assessed collectively. Consequently, important elements are left to be considered through subsequent consenting processes after the principal decision has been made. Such an approach contravenes the legal principle established in Raeshaw Farms, which requires that a project be assessed as a whole rather than being "salami-sliced" into parts whose individual effects may appear smaller. This fragmented assessment undermines the integrity of the planning process and the ability to fully understand and mitigate the project's cumulative impacts.

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. Specifically, the landscape, heritage, and socio-economic assessments underpinning the cumulative evaluation have been

shown to understate the effects, as previously detailed. Consequently, the cumulative assessment is anchored to this diminished baseline, resulting in an underestimation of the combined impacts of the proposed development alongside other existing, consented, and foreseeable projects. This methodological flaw calls into question the reliability of the cumulative impact conclusions, as they do not fully capture the true extent of combined effects that would arise. Therefore, the cumulative assessment cannot be regarded as robust or comprehensive in its current form.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.956 Public Engagement, Site Selection and Environmental Information

The consultation process for the site-selection has been fundamentally compromised by deficiencies in public participation, directly affecting the legitimacy of the entire exercise. The applicant requests Scottish Ministers to place significant weight on the site-selection process; however, this process has been marred by inadequate engagement at both the plan and site-selection stages, persisting into the current application phase. Notably, the application documentation consists of many thousands of pages of technical material. The consultation period occurred during the busiest months of the year for island communities, when residents are fully occupied by continuous work throughout the visitor season and access to specialist advice is at its lowest. In stark contrast, the applicant has benefitted from years of preparation supported by substantial professional and financial resources, creating a substantial imbalance in the ability to engage meaningfully.

National planning policy, specifically GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected by decisions of this scale must have a realistic and fair opportunity to participate. The conditions imposed on the affected communities in this instance fall significantly short of these standards. This failure undermines the integrity of the decision-making process, and it is requested that Ministers give careful consideration to this deficiency when evaluating the representations submitted.

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused

place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.957 Effects on Local Area

The applicant's environmental and heritage impact assessment notably lacks adequate consideration of the direct effects on Islay and Colonsay communities, despite their proximity to the proposed development area. While mitigation measures focus on specific project locations, there is an absence of place-based evaluation addressing how Islay's Atlantic-facing settlements, situated adjacent to the nearest edge of the 448 square kilometre development zone, will experience changes to their setting, local economy, or community life. This omission undermines the reliability of the assessment by failing to account for the social and economic implications on these island populations.

Furthermore, for Colonsay and Oronsay, the daily seaward outlook, integral to their identity, faces the development directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national significance within this community, is inadequately assessed, particularly regarding the impact on its open maritime setting. These shortcomings collectively demonstrate that the effects on the heritage and natural environment of these islands have been underassessed, thereby calling into question the overall conclusions presented in the application.

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it nonetheless underestimates their scale and significance, particularly when compared to the mitigation measures proposed. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, producing an effect described as Moderate and Significant. Despite this, the proposed mitigation does not adequately address the pervasive visual intrusion experienced from key locations, including the ferry crossing between Fionnphort and Iona, which forms a vital arrival point and is integral to the island's sense of place.

The West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. However, the evaluation falls short in capturing the full cultural and heritage significance of Iona's monastic landscape, which includes the Abbey, the Nunnery and the high crosses. This heritage is of international importance, with its

significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet notably, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impact on this internationally important heritage setting.

Furthermore, the social impact assessment appears incomplete, particularly in relation to the community on Iona itself. A household consultation revealed that 92 per cent of respondents object to the proposal, reflecting widespread local concern. The applicant's own consultants identify habitability as a potential pathway of effect on this community, yet this important consideration was never fully assessed. To contextualise the scale of the visual impact, the largest turbines would surpass the height of Ben Hynish on Tiree, a well-known landmark standing at 141 metres and visible from Iona at approximately 33 kilometres; the turbines would be approximately 194 metres tall and at roughly two-thirds of that distance. This comparison underscores the considerable and underappreciated magnitude of the proposed development's visual presence, which is likely to exacerbate the adverse effects on both the community and the heritage value of Iona.

While the applicant acknowledges significant visual effects at key locations such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort—the gateway to Iona and crucial to the visitor experience—their assessment attributes only medium magnitude effects despite recognising high sensitivity in these areas. This approach suggests a mitigation comparison that underestimates the true scale of impact on communities most directly tied to visitor flows. The acceptance of significant effects here contrasts with a seemingly inconsistent application of significance across other sensitive areas.

Further scrutiny reveals that although the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as the Loch na Keal National Scenic Area—an area of high sensitivity spanning approximately 21 to 33 kilometres—the effects are again limited to medium magnitude. This assessment appears to rely heavily on distance as a mitigating factor rather than fully accounting for the intrinsic value and interrelated character of these designated landscapes. For example, the treatment of the Wilderness and Gribun Rocks coastal area, where changes at distances exceeding 30 kilometres are deemed small, exemplifies this distance-based reasoning that may downplay the project's visual and experiential consequences.

Moreover, the applicant's assessment does not adequately address the broader economic and community impacts on Mull's western coastal townships, whose tourism economy and wildlife boat operations are intimately connected to the Atlantic seascape that the development would industrialise. None of these communities has received a place-based assessment, leaving a significant gap in understanding how the project would affect livelihoods and landscape appreciation in areas dependent on the natural environment. In sum, the assessment underrepresents the cumulative visual, economic, and community impacts on Mull and the Ross of Mull, particularly regarding designated landscapes and tourism-reliant communities, warranting a more thorough and place-specific evaluation.

The applicant's assessment of the wider seaboard designated landscapes and island communities results in practical consequences that risk undermining the protection of their essential natural and cultural qualities. Notably, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing a critical phase of regeneration. This small, re-establishing community depends fundamentally on the unspoilt seascape and setting at stake, yet the applicant has failed to provide any assessment of the potential effects on Ulva. The absence of consideration for such a vulnerable community raises concerns about the adequacy of the overall evaluation and the safeguarding of the island's recovery prospects.

Further scrutiny reveals that other significant designated landscapes, despite their acknowledged sensitivities, are similarly underestimated. Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold advised by NatureScot for assessing National Scenic Area effects. The applicant nonetheless concludes that the scale of change on Staffa would be small and not significant, despite recognising its panoramic maritime qualities. Similarly, the Jura National Scenic Area, located around 28 to 32 kilometres away, is assigned High sensitivity but only Medium to Low magnitude of effect, justified by distance and retained landforms, even though its designation is founded on its wild, undeveloped Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. These assessments collectively suggest that significant effects on these important landscapes may be overlooked, thereby diminishing the protection of their distinctive character and the integrity of the island communities that rely on them.

The applicant's assessment concludes that the South Tiree coastal area, despite being approximately 35 kilometres away, experiences only a Low magnitude of change, even though it is acknowledged as having High sensitivity. This practical consequence is significant because it suggests that the visual and landscape impacts on Tiree's sensitive environment are minimal, which risks underestimating the true extent of change that the proposed development would cause. Such an understatement could lead to insufficient mitigation measures and a failure to fully protect the island's distinctive character.

Tiree's landscape is exceptionally low-lying and defined by the interplay of sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The introduction of turbines up to 335 metres tall would create vertical elements unprecedented in the island's open seascape, fundamentally altering the horizon that is central to its character. Given this context, assigning a Low magnitude of change to such a sensitive receptor is inconsistent with the physical reality and landscape experience, leading to an unreliable evaluation of effects that should be revisited to accurately reflect the scale of visual intrusion.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape impacted by the proposed development. This omission undermines the comprehensiveness and reliability of the environmental appraisal. For instance, Gigha, a community-owned island emblematic of island regeneration following its

purchase by residents, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its clear exposure to the development’s influence. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation criticised in this objection, yet they remain unassessed. Furthermore, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are intrinsically linked to the open Atlantic seaboard views toward Islay, Jura, and adjacent waters. The Treshnish Isles and other smaller islands and mainland coasts with sightlines towards the development area share this position. By neglecting to evaluate the effects on these communities, the assessment fails to consider important social and economic receptors, thereby compromising its integrity and the planning process. It is therefore essential that the applicant revisits the assessment to fully incorporate the potential impacts on these mainland and island communities.

The applicant’s approach to assessing environmental effects employs a systematic moderation and discounting of impacts on sensitive receptors located beyond approximately 20 kilometres, resulting in a significant underestimation of those effects. Taken together, the evidence demonstrates a clear pattern: wherever a highly sensitive receptor lies beyond this threshold, the magnitude of change is artificially reduced and the resultant effect is correspondingly diminished. Crucially, this approach fails to provide any place-based assessment for the communities experiencing these impacts, effectively overlooking their exposure and the significance of the effects upon them. Such a methodology undermines the integrity of the environmental impact assessment by neglecting the genuine extent and severity of impacts beyond the 20-kilometre boundary.

1.1.958 Personal Observations

In addition to the planning matters above, I am personally concerned because: Having lived and worked on Mull and the adjacent mainland as an ecologist, I appreciate the need to move away from fossil fuels but also the fragility of coastal systems and the immeasurable societal benefits they give us in terms of well-being and diverse so-called 'ecosystem services'. As well as specific quantifiable ecological impacts of this proposal there are also qualitative personal impacts (severe visual intrusion for instance) that - although perhaps less easy to measure - are just as important to consider in this situation.

Based on my own local knowledge, I also wish to highlight that: Nothing specific outweighs anything else. There is a need to give full consideration to every local environmental. landscape, wildlife and community feature affected by this proposal.

Finally, I would also ask the Scottish Ministers to consider: These coastal and island systems - both ecological and societal - are incredibly precious. Importantly, although obviously precious to those who live and work there or who visit, they are also incredibly precious to those who have never been (and might never have the opportunity to do so). The 'climate crisis' is real and requires urgent action - at the societal level - but great care must be taken to ensure that in the rush to 'address the

problem' (with the inevitable hinting at economic benefits, job creation and boosts to the 'green economy'), that unique and beautiful ecosystems with millennia of social and cultural history attached to them, alongside all the current communities and cultures are not destroyed, damaged, or diminished in any way by such developments.

1.1.959 Further Comments

As an ecological scientist who has lived and worked in the area (mainland Argyll, Mull) on and off for over 40 years, and who thinks about the area and it's wildlife and people, it's tides and it's weather, on an almost daily basis, this proposal seems like environmental vandalism and should not be allowed to proceed.

1.1.960 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements applicable to its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and cultural heritage of the area. However, published reviews of the applicant’s documents reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While the impacts on island communities have been identified, they remain unassessed. Additionally, the ecological criteria stipulated have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently under consideration by the Scottish Ministers.

Given these shortcomings, it is urged that consent for the MachairWind Offshore Wind Farm be refused, along with the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, it is recommended that the determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also sought that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 199
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm, which is the subject of two applications: application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this letter be recorded as an official objection, that I be listed as an objector, and that I receive notification of the outcome of these applications.

The development proposed comprises an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would consist of between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a designated Windfarm Development Area covering around 448 square kilometres of sea to the north-west of Islay and west of Colonsay. The location is approximately 21 kilometres from the island of Iona and is situated in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which are elaborated in the following sections with reference to the relevant statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies entirely with the applicant to provide sufficient evidence demonstrating compliance with the applicable tests prescribed by law and policy. Objectors are not required to establish contrary proof. On the basis of the evidence presented, the applicant has failed to satisfy this burden, and accordingly, consent ought to be refused.

1.1.961 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a clear distance threshold beyond which major effects are deemed to cease, yet an independent Evidence Note reveals a consistent pattern indicating that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change. This finding persists regardless of the receptor’s sensitivity or the extent of visibility. The applicant’s own documentation corroborates the influence of distance on these judgements: for instance, an assessment of a coastal area more than 30 kilometres away concludes that the scale of change is small due to the viewing distance. Furthermore, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in the application of protective tests to understated inputs. Consequently, the conclusions drawn do not provide a reliable depiction of the effects that the Scottish Ministers are being asked to consider for consent.

There remains significant uncertainty regarding the long-term implications of introducing aviation and navigation lighting to a previously unlit sea horizon. This

permanent alteration to the character of the night-time seascape would endure throughout the stated 35-year operational life of the development, fundamentally changing the visual experience of the area after dark. The extent to which this change may affect the intrinsic qualities of the seascape and its wider environmental context cannot be underestimated, particularly given the absence of precedent for such lighting in this location.

Moreover, it is important to recognise that the 35-year operational period does not mitigate the policy implications of consenting to this development. Approving the proposal effectively signals that this seascape is deemed appropriate for wind farm use, with all attendant impacts on its character accepted. This decision would set a precedent for the use of this marine environment, potentially influencing future considerations and the cumulative effects on the night-time seascape. Given these factors, careful reflection is warranted before concluding that the benefits of the scheme outweigh the irreversible changes to seascape character that would result.

1.1.962 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment risks underrepresenting the true cultural significance of the heritage assets by focusing predominantly on fixed viewpoints rather than the broader experiential qualities integral to their value. Their own baseline acknowledges that the significance arises from a combination of factors including pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These elements are inherently experienced dynamically, through movement, rather than from static observation points. Historic Environment Scotland has highlighted this limitation in their consultation responses recorded within the application, specifically requesting additional viewpoints to ensure these wider qualities are adequately captured. Without fully addressing these experiential and relational aspects, the assessment may fail to reflect the heritage assets' cultural significance in a comprehensive manner. Consequently, it is essential that the assessment methodology is expanded to incorporate these broader landscape and movement-based experiences to provide a more accurate and meaningful evaluation of heritage impacts.

1.1.963 Effects on Island Communities, Tourism and the Local Economy

The applicant's socio-economic assessment fails to provide an adequate basis for mitigation, particularly in relation to island communities. While the assessment in Chapter 18 offers detailed analysis of potential port communities at a regional scale, it notably omits any place-based evaluation of the island communities directly affected by the proposal. This omission is critical given that the applicant's own consultants identified habitability as a potentially significant pathway through which the development could impact these communities; yet no specific assessment of island habitability was undertaken.

Island economies differ fundamentally from regional averages, as they are heavily concentrated in sectors most vulnerable to changes affecting the qualities that attract visitors. Rather than reducing sensitivity, reliance on increasing visitor numbers actually intensifies dependence on these at-risk attributes. Consequently, the

assessment's conclusion that the island communities have low sensitivity to tourism effects is unsupported by evidence and rests solely on an unsubstantiated assumption. Without a place-based analysis tailored to the unique socio-economic context of the islands, the methodology is flawed and insufficient to understand or mitigate the true impacts on these vulnerable communities.

1.1.964 Ecology, Biodiversity and Habitats Regulations

The applicant has acknowledged the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area by submitting a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan. These documents are specifically prepared for circumstances where the integrity of a protected site may be compromised, signalling that the applicant does not rule out significant impacts. Notably, the submission of such documents underscores that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant's own assessment. This recognition forms a critical aspect of the application and warrants careful scrutiny in the decision-making process.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.965 Effects on Local Area

The applicant's own Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment concludes a moderate and significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point.

Iona’s monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant’s baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba’s Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impacts on this heritage asset.

Community concerns further emphasise the scale of effect, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant’s own consultants—has never been assessed for this community. To contextualise the visual scale, the largest turbines would overtop Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by about 194 metres at roughly two-thirds of that distance.

Taken together, these points demonstrate that the applicant’s assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona. This undermines the accuracy of the environmental and social impact evaluation and warrants further, more rigorous assessment to fully understand and address the effects on this sensitive and internationally important locale.

1.1.966 Personal Observations

In addition to the planning matters above, I am personally concerned because: My family comes from Scotland, at least in part. My father has done painstaking work on family records. I know that America is seen as brash and doing things for money, but I had the image of things being different across the pond, with a seemingly greater amount and more care put into legislation concerning things like the environment. I know that power demands for… certain things… are extremely high and only increasing. But perhaps marring some of the Earth’s most beautiful seascapes isn’t the way to get it. (And perhaps those “certain things” should be used more carefully, though I suppose that’s beyond the scope of this)

1.1.967 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant’s own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant’s documentation reveal that the magnitude of these impacts has been underestimated, and crucially, the necessary heritage assessment has not been conducted. Moreover, while the effects on the island communities impacted by the development were identified, no assessment of these effects has been undertaken. The ecological requirements associated with the project remain unproven as capable of being met. It is also pertinent to note that only a portion of the entire project is currently submitted for consideration by the Scottish Ministers.

In light of these significant shortcomings, it is respectfully submitted that both consent for the MachairWind Offshore Wind Farm and the corresponding marine licence should be refused. Should the Scottish Ministers contemplate granting approval, it is requested that they first require the submission of additional environmental information and enhanced visualisations to clarify the full extent of impacts. Furthermore, any determination should be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection are thoroughly examined in an open and transparent forum. Regardless of the final decision, it is further requested that the Ministers explicitly address and provide reasoned conclusions regarding the effects on cultural heritage and the island communities affected by the proposal.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 200
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which comprise application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this communication be recorded as an official objection, that I be registered accordingly, and that I receive notification of the final determination regarding these applications.

The project under consideration involves the construction and operation of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. These turbines are to be situated within a Windfarm Development Area encompassing roughly 448 square kilometres of marine environment, positioned to the north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

My objection is founded upon planning and environmental considerations framed by the relevant statutory and policy context governing these applications. It is pertinent to emphasise that the onus lies solely with the applicant, MachairWind Limited (ScottishPower Renewables), to furnish adequate and compelling evidence demonstrating that all applicable statutory tests and policy criteria have been met. There is no requirement for objectors to establish the contrary. Having carefully reviewed the submitted material, I conclude that the applicant has failed to satisfy this evidential burden. Consequently, the applications should be refused consent.

1.1.968 Legislative and Policy Framework

The application must be refused because it fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment as set out in law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the applicant is required to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. This statutory obligation has not been fulfilled, as the evidence demonstrates that the environmental impact assessment is inadequate and incomplete.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not provide sufficient evidence to demonstrate compliance with these requirements. There are significant deficiencies and omissions in the habitats regulations assessment, leaving the potential impacts on protected sites unquantified and unmitigated.

Where compliance with these legal frameworks has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these failures must weigh decisively against the granting of consent. In this case, the absence of a robust and compliant environmental impact

assessment and habitats regulations assessment constitutes a fundamental procedural and evidential defect that precludes lawful approval of the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural and substantive deficiency. This statutory requirement is clear: the interests of island communities must be explicitly taken into account and given due weight throughout the decision-making process. The absence of demonstrated compliance with this duty undermines the legitimacy of the proposal and its conformity with the applicable legal framework.

The evidence before the determining authority does not show that the interests of island communities have been adequately identified, assessed, or integrated into the planning evaluation. There is a notable omission of any substantive analysis or justification addressing how the proposal aligns with or impacts these communities. This failure to engage with the statutory duty constitutes a direct conflict with the Islands (Scotland) Act 2018 and relevant policy expectations, which require transparent and reasoned consideration of island community interests.

Given these deficiencies and the lack of demonstrated compliance, the proposal cannot be regarded as meeting the necessary legal and policy standards. As established by the statutory framework and confirmed by authoritative guidance, where such failures exist, they weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not fulfill the statutory obligation to properly consider and give due weight to the interests of island communities.

1.1.969 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. Although NPF4 Policy 11 endorses renewable energy projects, this support is expressly conditional upon adherence to its impact criteria, including Policy 11(c) relating to impacts on communities, as well as Policies 11(d) and 11(e) concerning effects on landscape, seascape, and other receptors. A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that the safeguarding of island communities would be ensured. In addition, the ecological assessments submitted do not provide sufficient evidence to conclude that the necessary ecological tests can be satisfied. Taken together, these shortcomings indicate a clear conflict with the impact criteria of NPF4 Policy 11, calling into question the acceptability of the development as currently proposed.

The applicant's evidence identifies that Policy 11 operates in conjunction with several other key policies within NPF4 aimed at safeguarding nationally important assets. Specifically, Policy 4(c) and 4(d) provide protection for National Scenic Areas and nationally significant landscapes, ensuring they are not subject to significant adverse effects on the qualities for which they are designated. Additionally, Policy 7

addresses scheduled monuments and their settings, with particular reference to parts (h), (c), and (d) of that policy. Policy 3 focuses on biodiversity conservation, setting ecological standards that developments must meet.

Upon detailed examination, the proposal in question fails to align with these protective policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental qualities that warrant their designation. Moreover, the submission has not sufficiently demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns about potential harm to heritage assets. The applicant has also not shown that the interests of island communities, which are often closely linked to their natural and historic environments, would be adequately safeguarded. Finally, the ecological requirements outlined under Policy 3 have not been convincingly addressed; the necessary tests to confirm that biodiversity impacts could be mitigated or avoided have not been met based on the evidence provided.

In conclusion, the proposal conflicts with multiple relevant NPF4 policies designed to protect designated landscapes, heritage assets, and biodiversity. This failure to comply with established safeguards indicates that the development should not be supported in its current form.

The proposal is found to be in conflict with the terrestrial development plan framework, specifically the Argyll and Bute Local Development Plan 2, in relation to effects experienced on land. It would have an adverse impact on the landscape, heritage, and community interests that these policies are designed to protect. This conflict is clear and significant within the context of the relevant local policies.

Furthermore, this inconsistency extends beyond the local development plan to the National Planning Framework 4 when considered in its entirety. The proposal fails to align with the overarching national policy aims that guide sustainable and appropriate development in this area. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or mitigated.

In conclusion, given the identified adverse effects and the lack of justification or demonstration to the contrary, it is clear that the proposal does not accord with the relevant terrestrial development plan policies or the broader national planning framework. As such, it should not be supported.

1.1.970 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, does not specify a distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of receptor sensitivity or visibility extent. This implicit role of distance is further demonstrated by the applicant’s own documents, which assess a coastal area over 30 kilometres distant by concluding that, given the viewing distance, the scale of change is small.

Additionally, the Landscape Character synthesis describes High magnitude effects within about 20 kilometres, Medium effects between roughly 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the protective assessments appear to rely on systematically moderated magnitude inputs at precisely the distances where the most sensitive designated landscapes are located. This methodological approach results in conclusions that do not reliably reflect the true effects that the Scottish Ministers are being asked to consider.

While the applicant has adhered to NatureScot's visualisation guidance, it is important to recognise the inherent limitations of the visual materials presented in support of the assessment. NatureScot explicitly acknowledges that printed visualisations cannot fully replicate the scale and perception experienced by a viewer on site. Moreover, wireline drawings, which accompany the panoramic photographic projections, share these same constraints. They function merely as technical renderings within the overall visualisation framework rather than serving as independent tools to correct or enhance the viewer's understanding of scale and impact. Consequently, the visual evidence provided may not fully convey the true extent of the development's visual presence in the landscape. This limitation should be carefully weighed alongside any proposed mitigation measures when assessing the application.

While mitigation measures may address certain visual impacts, the introduction of aviation and navigation lighting to a previously unlit sea horizon represents a fundamental and permanent alteration to the night-time seascape character for the full 35-year operational period of the development. This change is not merely a temporary or reversible effect; rather, it signifies a lasting transformation that, in policy terms, confirms the seascape's suitability for wind farm use. Consequently, consenting to this development entails accepting this enduring impact on the night-time seascape environment.

The applicant acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal's conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.971 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets stems from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, and

the relationships between monuments, spirituality, and the surrounding landscape and seascape. These attributes are primarily experienced dynamically, through movement rather than static viewpoints, underscoring the importance of a comprehensive evaluation of the broader cultural landscape and experiential dimensions.

However, Historic Environment Scotland's consultation responses, as recorded within the application, highlight that the assessment has not fully captured these wider qualities. The request for additional viewpoints signals a recognition that the current evaluation may inadequately represent the heritage impacts, particularly concerning the spatial and experiential context that defines the cultural significance. This omission suggests that the heritage assessment requires a more nuanced and holistic approach to properly reflect the full extent of the heritage assets' baseline qualities.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.972 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these

defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

The applicant's failure to assess the habitability of the affected islands means the socio-economic impacts on island communities have not been properly understood or mitigated. Although their own consultants recognised habitability as a potentially significant pathway for effect, no place-based analysis was conducted for these communities. Instead, the assessment in Chapter 18 focuses on regional-level analysis, detailing port communities while neglecting the island populations directly facing the development. Despite this omission, the report concludes that island communities exhibit low sensitivity to tourism impacts. This conclusion is fundamentally flawed. Small island economies differ markedly from regional averages, being heavily reliant on sectors vulnerable to changes in visitor-attracting qualities. Far from reducing sensitivity, dependence on increasing visitor numbers intensifies vulnerability to any degradation of those qualities. Therefore, the assertion of low sensitivity, reached without specific place-based evidence, cannot be accepted as sound assessment but must be regarded as an unfounded assumption.

The applicant's evidence acknowledges that island communities necessitate particular scrutiny in the planning process, yet it concedes a failure to undertake the comprehensive assessment required to understand the proposal's effects upon these communities. This omission is significant given that the decision-making framework engages GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence. Where such evidence is lacking, a precautionary approach is explicitly required. Moreover, the proposal must accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, which impose a statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the earliest stages to the conclusion of the decision-making process.

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.973 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I

habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan constitutes a critical element in the assessment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area. These documents acknowledge the possibility that the proposed development may affect the integrity of this protected site, specifically targeting the guillemot population, and are indicative of the applicant's recognition that such impacts cannot be definitively excluded at this stage. By preparing these documents, the applicant is addressing the requirements set out under derogation provisions, which are invoked when adverse effects on a protected site are uncertain but cannot be ruled out. It is important to note that, as per the applicant's own position, the Scottish Ministers retain the discretion to reach a different conclusion regarding the presence or absence of adverse effects on site integrity. Therefore, the submission of these derogation and compensation documents is both a procedural necessity and a substantive acknowledgment of potential environmental risks associated with the proposal. This measure should be seen as an integral part of the application, reflecting a responsible approach to managing possible impacts on protected ecological interests.

The application before the authority has not demonstrated, beyond reasonable scientific doubt, that the proposed development will avoid adverse effects on the integrity of the protected habitat site. Under the Habitats Regulations, consent may only be granted where the competent authority is satisfied that there will be no such adverse impact, unless the stringent derogation tests are satisfied. The burden of proof lies firmly with the applicant to establish this, and in the absence of conclusive evidence, consent cannot lawfully be granted.

This legal framework is reinforced by policy provisions including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies set a high evidential standard, reflecting the critical importance of safeguarding protected sites and species. Mitigation, compensation measures, or proposals for future monitoring, while important, do not alone satisfy the statutory requirements and cannot be substituted for clear scientific certainty regarding the absence of adverse effects.

In conclusion, given the current evidential deficiencies and the rigorous legal and policy tests that apply, it is incumbent upon the competent authority to withhold consent. Only where the applicant can incontrovertibly demonstrate compliance with the Habitats Regulations and associated policies should the development be permitted, thereby ensuring the protection of nationally and internationally designated habitats.

1.1.974 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development’s full implications.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide a reliable measure of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the assessment is grounded in baseline evaluations that have themselves understated key impacts on the landscape, heritage, and socio-economic factors. As a result, the cumulative assessment does not fully capture the extent of harm that may arise from the collective developments in the area.

This issue stems from the fact that the cumulative assessments are dependent on conclusions drawn in other parts of the Environmental Impact Assessment. If those underlying assessments begin with a reduced baseline—one that does not adequately recognise the existing conditions and potential sensitivities—then the cumulative effects are inevitably minimised. In other words, any initial understatement of impacts is carried forward, meaning the aggregation of developments appears less significant than it truly is.

Therefore, the cumulative impact assessment as presented cannot be relied upon to inform sound planning decisions. Without an accurate baseline and a thorough evaluation of combined effects, there is a clear risk that the overall consequences for the environment and community are underestimated. This undermines the robustness of the Environmental Impact Assessment and suggests the need for a more comprehensive and accurate approach before the proposal is approved.

There remains considerable uncertainty regarding compliance with established planning policies and environmental regulations, particularly concerning the issue of project splitting. The applicant has not sufficiently demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), or the Environmental Impact Assessment Regulations. Specifically, the cumulative and in-combination effects of the proposal, as well as the overall impacts of the project, have not been reliably identified or thoroughly assessed.

This omission is significant as it undermines the integrity of the decision-making process. It is therefore essential that the treatment of any deferred works be explicitly addressed in the determination. Without such clarification, the potential environmental consequences may remain inadequately evaluated, which is contrary to the requirements of the relevant policy framework and statutory duties. Consequently, I respectfully request that these matters be given explicit and comprehensive consideration before any approval is granted.

1.1.975 Personal Observations

In addition to the planning matters above, I am personally concerned because: Regular involvement with the Inner Hebrides over a long lifetime for educational, cultural and recreational activity, formal and informal.

Negative national consequences of surrendering natural resources to foreign exploitation and profit.

Based on my own local knowledge, I also wish to highlight that: Multiple.

Finally, I would also ask the Scottish Ministers to consider: Scotland's natural resources to be controlled and used for Scotland's benefit and for genuine global climate benefit

1.1.976 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted documentation reveal that the extent of these impacts has been underestimated, and that a comprehensive heritage assessment, as mandated, has not been conducted. Furthermore, while the proposal identifies effects on the island communities involved, it does not provide any formal assessment of these impacts. The ecological criteria necessary for approval have also not been demonstrated as achievable. Compounding these concerns, the

application before the Scottish Ministers does not encompass the entirety of the project.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the accompanying marine licence.

Should the Ministers consider otherwise, it is requested that additional environmental information and enhanced visualisations be sought. Moreover, determination of the applications should be deferred until after a public inquiry, enabling thorough examination of the issues raised within this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and reach clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.