Member of Public 4914

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to the Proposed MachairWind Offshore Windfarm Development. Ref:00012385/00012386 Re: HES
Date:	17 October 2026 23:27:30

To: The Marine Directorate

Subject: Objection to the Proposed MachairWind Offshore Windfarm Development. Ref:00012385/00012386

Date: 16th Oct, 2026

Dear Sir/Madam,

I have read Historic Environment Scotland's (HES) objection to the MachairWind application, in which they raise significant concerns. As a statutory consultee, the HES objection carries substantial weight in the planning decision-making process.

I have reviewed the following high level assessments: Strategic Environmental Assessment (SEA) 2019, the associated Draft Updated Sectoral Marine Plan for Offshore Wind Energy: Strategic Environmental Assessment Environmental Report (2025), and the Draft Updated Sectoral Marine Plan for Offshore Wind Energy: Regional Location Guidance (2025). I note that Iona Abbey appears to have been omitted from these high-level assessments, whereas the equivalent 2013 documentation clearly identified it. I also note that the SEA 2019 states it 'builds upon' the earlier 2013 assessments.

As I understand it, high-level Strategic Environmental Assessments are governed by the Environmental Assessment (Scotland) Act 2005, which serves as a macro-level screening tool for the government to evaluate broad geographical areas for national plans. It is neither designed nor legally required to catalogue every specific local heritage asset. Consequently, the baffling omission of Iona Abbey in the SEA 2019, and subsequent documentation, does not imply that Iona Abbey has become less important than in 2013 when it was included in the SEA 2013. Rather the high-level Strategic Assessment is not the vehicle in which to assess Iona Abbey – that is the role of the Section 36 Application for the project in its context.

The Section 36 Application is an Environmental Impact Assessment (EIA) at project level and is governed strictly by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The law dictates that a developer's EIA Report must independently identify and assess all site-specific, localised significant environmental effects on their own merits, which includes Iona Abbey.

Therefore, the formal objection raised by HES carries immense planning weight, as this current process is the sole mechanism through which the environmental impacts on Iona Abbey from the proposed development will be properly assessed. As a statutory consultation body under Scottish planning law, HES's expert assessment of cultural heritage and historic settings is a material consideration of the highest order. HES has objected because they state the proposal directly conflicts with Policy 7 (Historic Assets and Places) of National Planning Framework 4 (NPF4) and the Historic Environment Policy for Scotland (HEPS), both of which require the protection of the settings of Scotland's most revered monuments.

I therefore urge Scottish Ministers to give full material weight to HES's objection and refuse consent for this application.

Yours faithfully,

[Redacted]

Sent from AOL on Android

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	SUBMISSION OF ADDITIONAL REPRESENTATION: MachairWind Offshore Wind Farm (Section 36 & Marine Licence Applications - Reference MD-00012385)
Date:	19 October 2026 18:30:14

Dear Marine Directorate Licensing Operations Team,

Re: MachairWind Offshore Wind Farm – Procedural Failures regarding Statutory Oversight, Omitted Drilled Spoil Waste Streams, and Inadequate Transboundary Consultation

I am writing to forward and formally update my previous objection regarding the **MachairWind Offshore Wind Farm** consent applications.

Following the publication of the statutory consultation responses on the Marine Directorate Portal, critical regulatory and procedural blind spots have become apparent. While Historic Environment Scotland has rightly objected on heritage grounds, and **NatureScot** has issued vital findings regarding adverse landscape, marine mammal, and avian impacts, the consultation loop has entirely overlooked a multi-million-cubic-metre environmental threat: **the unquantified mass-balance of drilled rock spoil and its associated disposal impacts.**

I recognize that the **Scottish Environment Protection Agency (SEPA)** deferred to standing advice due to its strict 3-nautical-mile Triage Framework. However, because this physical waste is generated in deep offshore waters, **the Marine Directorate—as the competent authority—should have explicitly directed NatureScot to audit these mass-balance calculations** under their benthic ecology and Marine Protected Area (MPA) remits.

Furthermore, I wish to challenge the Marine Directorate's failure to elevate the **Joint Nature Conservation Committee (JNCC)** to a co-statutory advisory role for this specific determination. While the physical array sits technically within the 12-nautical-mile boundary, the environmental effects are intensely transboundary. Treating the JNCC as a non-statutory consultee because of arbitrary geographical lines ignores the reality that acoustic shockwaves from 15-metre diameter piles and drifting sediment plumes from millions of cubic metres of rock waste will breach territorial lines and directly damage offshore ecosystems under the JNCC’s legal care.

Because the Marine Directorate failed to properly coordinate and prompt this specific scrutiny, the burden of ensuring a legally compliant Environmental Impact Assessment (EIA) falls squarely back upon the Scottish Ministers. I urge you to review the attached refined addendum and my original objection below. It is imperative that the Scottish Ministers exercise their powers under **Regulation 19** to halt the determination process until the applicant supplies Supplementary Environmental Information (SEI) addressing these critical gaps.

ADDENDUM TO OBJECTION: SUBMISSION OF ADDITIONAL REPRESENTATION

Project: MachairWind Offshore Wind Farm (Section 36 & Marine Licence Applications)

Subject: Procedural Gaps in Competent Authority Direction; Inadequate Transboundary Integration of JNCC; Reiteration of Regulation 19 Request

1. Failure of Competent Authority to Coordinate Transboundary Environmental Oversight

A meticulous review of the statutory feedback reveals that **NatureScot**, **SEPA**, and the **JNCC** have collectively failed to scrutinize the physical mass-balance calculations of fractured rock waste arising from the proposed 15-metre diameter monopiles.

- **SEPA's Lack of Engagement:** Justifiably triggered by its internal Triage Framework, SEPA deferred entirely to standing advice because the windfarm development area sits beyond nearshore boundaries.
- **NatureScot's Omission:** While NatureScot provided extensive evidence regarding landscape impacts, marine mammals, and avian mortality, they did not audit the physical volume of sub-surface rock waste.
- **The JNCC Marginalisation:** Despite the JNCC possessing deep-sea and offshore expertise, they were relegated to a non-statutory stakeholder because the application sits within the 12-nautical-mile limit. No consultation response has been logged.

As the competent planning authority, the **Marine Directorate** has a legal obligation to bridge these institutional boundaries. The Marine Directorate should have instructed NatureScot to cross-examine the developer's unsupported 30% rock-encounter rate. Crucially, given the sheer scale of the engineering footprint, the Marine Directorate should have formally integrated the JNCC's oversight. The physical reality of a 91-turbine array using 15m monopiles means that sediment plumes and acoustic impacts are inherently transboundary. By relying on a rigid "geographic map lines" approach, the Marine Directorate allowed an unassessed 1.35 to 2.25 million cubic metres of loose drilling waste to slip completely between the regulatory cracks.

2. Amplified Legal Necessity for a Regulation 19 Direction

Under the Marine Works and Electricity Works (EIA) (Scotland) Regulations 2017, an Environmental Impact Assessment Report (EIAR) must include a quantified estimate of expected residues and waste. Because the developer **has not** been pushed by statutory bodies to rectify this due to a lack of directional oversight from the Marine Directorate, the application remains fundamentally non-compliant with the Rochdale Envelope principle.

The Scottish Ministers cannot lawfully determine this project while millions of cubic

metres of potential benthic-smothering debris remain completely unaccounted for in terms of transit, carbon emissions, or local dumping impacts within the **Sea of the Hebrides Marine Protected Area (MPA)**. The issuance of a formal Regulation 19 direction is the only legally secure mechanism available to resolve this deficit.

I await your confirmation that the above will be dully processed.

Yours faithfully

[Redacted]

ORIGINAL OBJECTION SUBMITTED (BELOW)
Sent by Email 09:43, 9th August, 2026

This objection is raised on the grounds that the applicant's Environmental Impact Assessment Report (EIAR) fails to present a robust, legally compliant "realistic worst-case scenario" under the Rochdale Envelope principle. The EIAR violates Section 2.4.3 of the by withholding critical structural, temporal, and geological data. Consequently, the assessment of environmental effects on marine mammals and the Sea of the Hebrides Marine Protected Area (MPA) is deeply deficient.

Under the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) and the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, I formally request that the Scottish Ministers exercise their powers under Regulation 19 to halt the determination process until the applicant supplies (SEI) addressing the specific omissions detailed below.

1. Deficiencies in Substructure Specifications, Piling Durations, and Acoustic Impacts on Marine Mammals
The EIAR indicates an intention to utilize exceptionally large monopiles with a 15-metre diameter to support next-generation turbines reaching heights of 340 metres.

Throughout my professional career in architecture, I have been acutely aware of structural scaling requirements. While 15-metre diameter monopiles are typically driven up to 60 metres deep for standard, smaller-scale turbines, the immense static and dynamic aerodynamic loads exerted by 340-metre-high structures mean that the required pile penetration depth will likely be substantially deeper, extending up to or beyond 100 metres into the seabed.

The EIAR fails to explicitly define the design envelope's worst-case scenario regarding:

- **a.** The exact target penetration depths required for these 340m structures.

- **b.** The maximum hammer energies (kilojoules) required to drive a 15m diameter pile to such depths.
- **c.** The estimated length of time (hours per pile) and the cumulative number of piling days needed to complete the installation across the array.

This information is not a post-consent detailed design matter; it is a critical baseline metric. As repeatedly highlighted by the Hebridean Whale and Dolphin Trust (HWDT)—based right here on the Isle of Mull—the duration and acoustic intensity of impact piling are the primary drivers of Temporary Threshold Shift (TTS), Permanent Threshold Shift (PTS), and major behavioural displacement in cetaceans. By omitting the structural depths and structural drive-times, the applicant's underwater noise modeling is speculative and cannot legally prove that impacts on marine mammals will remain within manageable or mitigatable limits.

2. Unsubstantiated Geological Assumptions and Failure to Quantify Drilled 'Spoil'.
The applicant asserts a "worst-case scenario" wherein only 30% of the piles will require drilling instead of hammer driving due to rock obstructions. No empirical geological evidence or comprehensive geotechnical survey data has been supplied to substantiate this 30% figure.

The seabed of the MachairWind site sits directly upon the Palaeogene volcanic rock formations that characterize the Inner Hebrides and the Malin Sea—the exact same highly resistant basaltic lava flows that form the Giant's Causeway in Northern Ireland and Staffa’s Fingal’s Cave. Given this contiguous regional geology, it is safe to assume there is a significantly higher probability (potentially 70% to 100%) of encountering hard bedrock.

By underestimating the likelihood of hitting rock, the applicant has failed to define a realistic worst-case scenario. Furthermore, the EIAR completely omits a calculation of the resulting drilled 'spoil' (waste material). Under EIA regulations, a description of the project must include an estimate of the types and quantities of expected residues and waste.

Geometric and physical mass-balance calculations demonstrate the scale of this omission. Drilling a 15m diameter shaft generates a staggering volume of solid rock waste, which expands significantly when fractured (using a standard rock bulking/expansion factor of 40%):

- **Scenario A (60m Depth):** A single 15m wide shaft removes 10,603 m^3 of solid rock, which expands to 14,844 m^3 of loose spoil. For all 91 proposed turbines, this equates to 964,862 m^3 of solid rock, expanding to 1,350,806 m^3 of loose waste.
- **Scenario B (Realistic 100m Depth for 340m Turbines):** A single shaft removes 17,671 m^3 of solid rock, expanding to 24,740 m^3 of loose spoil. Across 91 turbines, this totals 1,608,103 m^3 of solid rock, expanding to 2,251,344 m^3 of loose waste.

Even under the applicant's unsupported 30% drilling assumption at a shallow 60m depth, the project would generate over 405,000 cubic metres of unassessed waste. At a realistic 100m depth with high rock encounter rates, the drilling waste exceeds 2.25 million cubic metres.

This immense volume of drilling waste would be completely additional to the 1.25 million cubic metres of spoil already cited for seabed leveling. The EIAR fails to declare whether this mass of debris will be dumped directly onto the seabed—causing severe benthic smothering and prolonged sediment plumes—or transported off-site, which would drastically alter vessel traffic, emission profiles, and dredging impacts. The EIAR is fundamentally deficient in this regard.

3. Formal Schedule of Data Requested under Regulation 19
To rectify these legal and environmental gaps, I urge the Scottish Ministers to formally direct the applicant to supply the following specific information via a (SEIS):

- **a. Geotechnical Integrity Surveys:** Provide the localized seismic reflection profiles and borehole data verifying the 30% rock-encounter assumption, contextualized against the regional Palaeogene basalt geology.
- **b. Engineering Design Envelopes:** Define the precise engineering parameters for the 15m diameter monopiles when supporting 340m turbines, specifically stating the maximum target penetration depth and the associated maximum hammer energy required.
- **c. Temporal Acoustic Profiles:** Provide a quantified estimate of the time required to hammer-drive a single pile to its maximum target depth, alongside a cumulative timeline showing the maximum number of simultaneous or consecutive piling days across the 91-turbine array.
- **d. Spoil Mass-Balance & Disposal Strategy:** Supply full volumetric calculations for drilling spoil across a tiered range of rock-encounter scenarios (30%, 70%, and 100%) and depth scenarios (60m to 100m), accompanied by a comprehensive disposal impact assessment specifying whether the material will be retained on-site or removed, the subsequent impacts on the Sea of the Hebrides MPA.

Until this critical information is provided, scrutinized, and subjected to public consultation, a lawful and scientifically sound determination of this application cannot take place.

I look forward to receiving your acknowledgement of this objection and an update on whether a Regulation 19 request will be issued to the applicant.

Yours faithfully

[Redacted]

[Redacted]

FROM:

[Redacted]

[Redacted]

Email: **[Redacted]**

To: Marine Directorate — Licensing Operations Team
Scottish Government
375 Victoria Road
Aberdeen
AB11 9DB

BY EMAIL: MD.MarineLicensing@gov.scot

Dear Sir/Madam,

OBJECTION TO PUBLIC CONSENT APPLICATION:
Electricity Act 1989: Section 36 Consent Application
Marine (Scotland) Act 2010: Part 4 Marine Licence Applications
Project Title: MachairWind Offshore Windfarm

Marine Directorate Case References: 00012385 & 00012386

RE: MachairWind - Objection to Impact on CUltural Heritage Assets and Context

Dear Marine Directorate Case Team,

I am writing to formally lodge my objection to the applications submitted by MachairWind Ltd for Section 36 consent and the associated Marine Licences regarding the proposed MachairWind Offshore Windfarm.

The basis of this objection is that the Environmental Impact Assessment Report (EIAR) severely underestimates and inaccurately scores the detrimental visual, cultural, and spiritual impacts of the development on the island of Iona. It fails to reference the umbrella Strategic Environmental Assessment of 2013 (SEA 2013), which stated clearly that it was incumbent on the EIA for each project that the ***'The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised'.*** That SEA 2013 under the' West' region further states that**:**

> *6.7.47 The region contains features of historic interest, including designated coastal sites such as Skerryvore Lighthouse in Tiree and* ***Iona Abbey.***

Iona Abbey is therefore one of only two highlighted features of historic interest in the SEA 2013 on the west coast. It would therefore be expected that Iona Abbey would be given the utmost respect in any developer's EIAR dealing with historic features. This has not been the case as set out below.

The detailed grounds for this objection are as follows.

1. STATUTORY POLICY CONTEXT AND LEGISLATIVE BREACHES

The Planning Statement admits to *'moderate adverse magnitude of significance of effect'* on Iona's landscape character types, visual receptors, and designated heritage settings (including the Abbey, Nunnery, and Conservation Area). However, in response the applicant appears to assert that these admitted adverse impacts are outweighed by the need to meet green energy targets. I do not believe this is correct because the application fails to meet the statutory thresholds established by Scottish planning law in the following aspects:

- **Historic Environment Policy for Scotland (HEPS):** Policy HEP4 explicitly mandates that any detrimental impact to an asset and its context must be identified, minimised, and managed. The applicant has failed to demonstrate that valid alternatives have been fully explored to minimise this harm.
- **National Planning Framework 4 (NPF4):** Policy 7c and 7h dictate that development proposals affecting scheduled monuments or listed buildings will only be supported where significant adverse impacts on the integrity of their setting are avoided. NPF4 does not require an asset's significance to be completely destroyed ("vitiated") before an application can be refused; it demands the preservation of its character and special historic interest.
- **Scotland's National Marine Plan (NMP):** Policy GEN 6 (Section 4.23) states that designated heritage assets of national or international significance must be protected *in situ* within an appropriate setting. Substantial harm is permitted only under strictly exceptional circumstances where no alternative exists

2. FUNDAMENTALLY FLAWED EIAR METHODOLOGY AND SCORING

2.1 The Applicant's Case

In Paragraphs 190 and 191 of the Planning Statement (6.2.5.2 *Planning Assessment Conclusions for Cultural Environment*), the applicant relies on Chapter 14 (*Offshore Archaeology and Cultural Heritage*) to argue that "substantial harm" only arises when an asset's cultural significance is "lost or severely compromised." Because the applicant's internal assessment matrix limits the change to setting to a "medium magnitude of impact" or lower, they conclude that no substantial harm arises, thereby claiming full compliance with National Marine Plan (NMP) Policy GEN 6.

2.2 The Methodological Failure and Incorrect Deficit Scoring

The applicant's conclusion relies entirely on a flawed evaluation matrix (Table 5.1). By arbitrarily scoring the impact on Iona's heritage assets as a *"low adverse magnitude,"* the applicant artificially depresses the outcome to a *"moderate adverse significance of effect."*

This scoring represents a profound failure of objective assessment. Given the pre-eminent status of Iona Abbey explicitly enshrined in the Scottish Government's Strategic Environmental Assessment (SEA) 2013, any robust, reasoned assessment of the adverse magnitude would, at a minimum, be rated as **"Medium Adverse"** or **"High Adverse."** Crucially, applying either a Medium or High Adverse Magnitude to an asset of Iona's national significance would trigger a **"Major Significance of Effect."** Within the Scottish planning framework, a finding of Major Significance of Effect on a primary heritage asset provides clear grounds for the outright refusal of the application.

The applicant's methodology is invalid and procedurally deficient within a Scottish jurisdiction for three distinct reasons:

- **Inappropriate Application of English Case Law:** In Paragraph 189 of the Planning Statement, the applicant refers to having support from case law – we can only assume that the case law inferred is an English High Court precedents *Bedford Borough Council v SSCLG* in which it was decided *that* "substantial harm" requires a near-total "vitiation" or destruction of an asset's baseline value. This reliance is legally flawed. Scottish planning law operates under an entirely distinct statutory framework to English Law. In Scottish Law the setting, integrity, and cultural landscape of heritage assets are afforded separate, independent protections that do not require physical destruction to trigger substantial harm.
- **Failure to Apply the HES EIA Handbook:** The Historic Environment Scotland (HES) EIA Handbook explicitly dictates that human perceptions of landscape and setting must include non-physical factors. These are defined as a knowledge of the place (its deep cultural and historical associations) and the intangible feelings generated by it. Instead of conducting this required qualitative analysis, the applicant's EIAR relies strictly on physical proximity and distance metrics, failing to thoroughly evaluate these statutory, non-physical criteria.
- **Inadequacy of Static Visualisations to Capture Dynamic Impact:** The photo simulations provided in Appendix 16.4 and Appendix 14.3 fail to accurately represent the baseline reality. The human eye resolves detail far more sharply than these static, compressed images. More importantly, static visualisations are structurally incapable of conveying the permanent, all-

pervading visual intrusion of 91 wind turbines in constant mechanical motion against a historically empty, open Atlantic horizon.

2.3 Conclusion to Fundamentally Flawed EIAR Methodology and Scoring

By relying on cross-border legal precedents that do not apply in Scottish Planning Law, failing to comply with HES qualitative guidelines for EIA, and failing to carry out an SLVIA that includes the key baseline data, the applicant has presented a flawed EIA to the decision-maker. The Marine Directorate therefore must reject the applicant's conclusions under Policy GEN 6 and refuse the application.

3. THE "WHOLE ISLAND" APPROACH VS. APPLICANT COMPARTMENTALISATION

A profound disconnect exists in Appendix 14.3 regarding the relationship between the island of Iona, its historic monuments, and its maritime landscape. The applicant argues that because a 130-degree arc of separation exists between the wind development area and Iona Abbey, a visitor or pilgrim crossing the Sound of Iona from Fionnphort can simply look away from the windfarm. This logic erroneously assumes human perception can compartmentalise a unified landscape.

In contrast, historical, cultural, and geographic evidence demands a "whole island" assessment framework:

- **Historical Unity:** As recorded by Bede (d. 735 AD) and Adomnán's 7th-century *Life of Saint Columba*, the monastery and the island have always been an indivisible entity. Monastic life and worship were not confined to the Abbey precinct but extended across the whole island and its surrounding seas and islands.
- **The Maritime Highway:** HES scoping advice repeatedly emphasises that the open, uninterrupted western and southern seascapes are intrinsic to how Iona is experienced as a place of isolation and pilgrimage. The sea was the dynamic "highway" to and fro, and not in one direction as stated in the EIAR, that bound the Dalriadan archipelago and connected St Columba to his roots in Ireland.
- **Dùn I as a 360-Degree Platform:** The applicant claims that connectivity to Ireland is merely symbolic because Ireland cannot be seen. Geographically, Ireland *is* visible from Iona's highest point, Dùn I. Adomnán's texts confirm that Columba regularly climbed Dùn I to speak with his brethren and one has to assume the hill was used to monitor seaborne activity and weather systems moving between the islands and Ireland. Placing an industrial array across this southern horizon permanently severs this 1500-year-old cultural and physical link.

4. FEASIBLE ALTERNATIVE SITE SELECTION

The severe visual and cultural degradation of Iona's setting is entirely avoidable. In Chapter 4 (Site Selection and Alternatives), the applicant asserts that the chosen area is uniquely required because they must avoid water depths greater than 60 metres to utilise proven fixed-bottom turbine foundation technology.

This technical justification is directly contradicted by the applicant's own corporate strategies. ScottishPower Renewables (SPR) has, concurrently with the MachairWind application, applied for MarramWind (which SPR now own) —a 3GW offshore project utilising deep-water floating turbine foundations.

As demonstrated by this application for MarramWind, floating foundation technology must be technically and commercially viable at scale. Therefore the MachairWind project could easily be re-applied for further west into deeper waters beyond the Skerryvore Lighthouse. Siting the windfarm in this remote location would allow the turbines to disappear into the Atlantic horizon. In visual impact terms only, such a remote, off-shore location would protect the historic northern, southern, and eastern horizons of the entire Dalriadan archipelago (including Tiree, Coll, Staffa, Colonsay, Islay, and Jura) while still fulfilling the Scottish Government's green energy objectives.

5. CONCLUSION AND PLANNING BALANCE

It is my assertion that there is no physical mitigation that can lessen the adverse impacts of this MachairWind development short of applying to locate it in a remote off-shore position.

The applicant's submission dedicates thousands of pages to utility metrics but skims the surface of Iona's deep historical legacy, completely omitting any mention of Iona in the final "Planning Balance and Conclusions" chapter of the Planning Statement, and demoting the compartmentalised Iona assets to bottom of the league table of affected sites in the Technical Summary of the Application. This occurs even though the Scottish Government's SEA 2013 - the umbrella study for all the individual EIAs for each proposed windfarm - specifically highlighted the importance in the 'west' sites examination (which includes the current Machairwind location,) just two historic settings: Skerryvore Lighthouse, Tiree and Iona Abbey, Iona.

The applicant's SLVIA from Dùn Ì is an example of all the above issues and in my opinion represents a fundamental methodological failure that misleads the decision-maker. The omission of Iona Abbey from the left frame of the visual baseline results in a profound distortion of the baseline data, effectively minimising the development's true impact on the setting of this pre-eminent heritage asset—a status explicitly enshrined in the Scottish Government's SEA 2013. Presenting an assessment of a nationally significant landscape while excluding its central cultural monument undermines the integrity and objectivity of the entire Environmental Impact Assessment Report (EIAR). Evaluating this landscape without capturing the Abbey is the functional equivalent of assessing the landscape impact on Stonehenge while excluding the stones themselves.

The EIAR in its assessment of the listed assets concludes by trivialising a foundational cultural setting as a ***'symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified'*** thus violating the core tenets of 'knowledge' and 'experience' cited in the HES EIA handbook.

The national socio-economic importance of the proposed development, as claimed by the applicant, must be balanced against the international cultural significance of Iona Abbey and its island context. As Professor Jonathan Burnside, Professor of Biblical Law, University of Bristol Law School, states:

> *"As the doyen of art and cultural history, Kenneth Clark, explained in his seminal work, Civilisation, European civilisation survived the collapse of the Roman Empire by the copying of books. Iona was one of only two or three places in the British Isles which provided, for a short time, a modicum of security for this great task. As is well known, Iona was founded by St. Columba, who came from Ireland in the 563 AD. But Iona was considered a sacred place even before he arrived. For four centuries it was the cradle of Celtic Christianity, with the island bearing witness, it is said, to as many as 360 large stone crosses. Clark describes the extremely sophisticated and refined 'pages of pure ornament' produced by the Celtic scribes as 'almost the richest and most complicated pieces of abstract decoration ever produced...' Thanks to the faith and works of the scribes of Iona, European civilisation got through by the skin of its teeth. The 'clear, round lettering' which came from their hands 'carried the word of God all over the Western world."*

An industrial deployment on the vast scale of MachairWInd is fundamentally incompatible with an iconic anchoring heritage asset that shaped the Western world. While there are numerous marine environments capable of hosting remote offshore wind infrastructure along Scotland's coastlines, **there is only one Iona**.

For the reasons detailed above, I respectfully urge the Marine Directorate to refuse consent for these applications.

Please acknowledge receipt of this formal objection and keep me informed of any updates, public local inquiry sessions, or final determinations regarding these cases.

Yours faithfully,

[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	FURTHER OBJECTION to the Section 36 and Marine Licence Applications for the MachairWind Offshore Wind Farm MD-00012385/MD-00012386: Marine Licence for the Transmission Infrastructure / Assets : Failure to Conclude on Worst-Case Scenario for Iona Abbey .
Date:	29 September 2026 14:36:18

From:

[Redacted]

Sent by email: MD.MarineRenewables@gov.scot

SUBJECT: FURTHER OBJECTION to the Section 36 and Marine Licence Applications for the MachairWind Offshore Wind Farm MD-00012385/MD-00012386: Marine Licence for the Transmission Infrastructure / Assets : Failure to Conclude on Worst-Case Scenario for Iona Abbey .

To: Scottish Ministers Marine Directorate – Licensing Operations Team

By Email: MD.MarineRenewables@gov.scot

SUBJECT: FURTHER OBJECTION to the Section 36 and Marine Licence Applications for the MachairWind Offshore Wind Farm – Failure to Conclude on Worst-Case Scenario for Iona Abbey

Dear Sir / Madam,

I am writing to submit a further formal letter of objection to the applications for the MachairWind Offshore Wind Farm. This representation is submitted in direct response to the Historic Environment Scotland (HES) consultation response, which I have reviewed via the HES website. I must note as a preliminary matter of serious procedural concern that this critical statutory response has not been published on the Marine Directorate application portal. The failure of the Marine Directorate to make this pivotal material consultation publicly available on its official platform undermines the transparency of the planning process, and I have raised this failure as a formal complaint with the Scottish Public Services Ombudsman.

This objection focuses strictly on the fundamental failure of the applicant's Environmental Impact Assessment Report (EIAR) to provide a clear, definitive conclusion on the "worst-case scenario" regarding the development's visual

impact on the setting of St Mary's Abbey, Iona, monastic settlement (SM12968) and Iona Abbey (LB12310).

1. Ambiguity and Contradiction in the Applicant's "Worst-Case" Methodology

The MachairWind EIA Report (EIAR) selectively applies statutory regulations and the Rochdale Envelope principle to present two separate project scenarios without providing a single, required worst-case conclusion.

By cherry-picking between legal frameworks and established case law, the application fails to deliver a definitive "reasonable worst-case" assessment as demanded by UK marine planning standards.

I fully understand that in major infrastructure projects, developers often do not know the exact final dimensions of their equipment (like the precise height of a wind turbine or the exact number of foundations) when they apply for permission. To handle this flexibility, UK planning law uses a framework built on two main pillars:

- **Statutory Regulations:** Scottish environmental laws state that an Environmental Impact Assessment Report (EIAR) must clearly evaluate the **"likely significant effects"** of a project on the environment before it can be approved.
- **The Rochdale Envelope Principle:** This is a legally binding judicial principle designed to handle flexibility. It dictates that if a project has unfinalised dimensions, the developer **must assess the "reasonable worst-case scenario."** This means evaluating the maximum possible adverse parameters (e.g., the tallest possible turbines combined with the most disruptive foundation drilling) so regulators know the absolute maximum damage the project could cause.

Crucially, statutory consultees like **Historic Environment Scotland (HES)** do not define these engineering parameters. They simply look at the absolute worst-case scenario provided by the developer and judge how badly it will impact cultural heritage.

The MachairWind application breaks these established legal and judicial rules by **cherry-picking** between legislation and case law to create **two separate project scenarios**, rather than delivering one unified worst-case conclusion as they are required to do.

In principle this approach is fundamentally flawed for several reasons:

- **It Fails to Identify the True Worst-Case:** By splitting the project into two distinct scenarios and failing to conclude which one is environmentally worse, the application

leaves the "outer bounds" of the project's impact completely undefined.

- **It Creates a Legal Loophole:** Presenting two separate scenarios allows the developer to hide the maximum cumulative impact. For example, Scenario A might be worse for marine life, while Scenario B is worse for historic landscapes. By not combining them or declaring a definitive "worst case," the true maximum environmental toll is never fully evaluated.
- **It Defies Regulator Directives:** Marine regulators explicitly command developers in their "Scoping Opinions" to model specific, high-impact worst-case events (such as unexploded ordnance detonations). Splitting the project into two weak scenarios dilutes and evades these direct regulatory instructions.
- **It Misrepresents Consultee Roles:** The developer cannot use the individual methodologies of bodies like HES to justify splitting the project's engineering profiles. It is the developer's sole legal responsibility to establish the maximum design envelope and apply it universally across all assessments.

Looking now specifically at the MachairWind application and HES's response to it, by failing to provide a definitive conclusion on which scenario is worse, MachairWind EIAR has failed to provide the competent authority with the legal certainty required to safely grant consent:

• Contradictory Layout Indicators: Chapter 14 of the EIAR states that the 91-turbine scenario (335m height) would normally represent the worst case due to turbine prominence. However, it simultaneously acknowledges that the denser 144-turbine layout (280m height) could result in greater impacts due to "turbine stacking" (Table 11.5, page 64).

• Flawed Design Envelope Assumptions: The applicant explains that the worst-case layout shown is a "dense edge" layout, intended to maximise both the lateral spread of turbines and the potential for stacking. However, as HES notes, a layout which does not extend to the edge of the developable area could, in some views, actually increase the potential for turbine stacking if turbines are positioned more closely together. The applicant's chosen modelling parameters fail to properly capture the true maximum potential adverse layout.

2. Failure to Provide a Clear Conclusion on the Iona Asset Group

The failure to conclude is explicitly clear in Appendix 14.3, which addresses whether the upper or lower design parameters represent the worst-case scenario. All assessments predict little or no difference in the magnitude of impact between the two scenarios, and several do not clearly identify a worst-case scenario. For the highly sensitive, internationally significant heritage assets on Iona, the assessment states:

"In the case of this asset, identifying a worst case is very difficult given the distance from the array and the large number and dynamic nature of the views experienced as the viewer moves through the asset group. At the

separation involved, any difference in magnitude of effect between the indicative 91 WTG and 144 WTG layouts is limited, but the increased scale and prominence of the larger WTGs, is likely to present the differentiating factor, albeit balanced by the denser layout required for the smaller WTGs" (Page 88).

Although the larger-turbine (91 WTG) layout is described as the likely differentiating factor, this is qualified by the statement that the effects are balanced by the denser 144-turbine layout. As HES rightly points out, the result of this qualification is that the reader is left to interpret which layout is considered the worst case, rather than being provided with a clear conclusion.

3. Visualisations Prove Policy Non-Compliance Despite Flawed Assessment

The applicant's inclusion of wirelines for both scenarios could be helpful but lack of clear labelling leads to confusion as what one is looking at:
Figure 16.2.1F this wire drawing is titled *144 Turbine Layout* so we know that is a wire drawing of the 144 layout.
however,
Figure 16.2.1A this wireline drawing is **untitled** so we do not know what if this is the 144 or 91 turbine layout.
Figure 16.2.22A this wireline drawing is **untitled** so we do not know what if this is the 144 or 91 turbine layout.
Figure 16.2.22D this wireline drawing is titled *144 Turbine Layout* so we know that is a wire drawing of the 144 layout.
etc.

Assuming that the untitled are the 91 Turbine layouts (?), these wireline drawings do expose the flaws in the applicant's own conclusions. The wirelines illustrate the range of potential impacts and provide sufficient visual information to support the assessment that this project is in non-compliance with Policy GEN 6 of the National Marine Plan (NMP) and Policy 7 of National Planning Framework 4 (NPF4). The visualisations prove that whether through the sheer scale of the 91-turbine layout or the dense stacking of the 144-turbine layout, the development will cause a significant adverse impact on the setting of Scotland's premier cultural and historic landscape. The applicant cannot use the difficulty of the assessment or the presence of raw visual data to evade its statutory duty to declare a definitive worst-case baseline.

Conclusion

Scottish Ministers cannot legally grant consent based on an EIAR that relies on ambiguity and leaves the competent authority to interpret which design scenario represents the true maximum impact. Because the environmental statement remains fundamentally inconclusive on this key methodological point, I urge the Scottish Ministers to sustain the objections raised by HES and refuse consent for the MachairWind application.

Yours faithfully,

[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	OBJECTION TO SECTION 36 CONSENT AND MARINE LICENCE APPLICATIONS FOR THE MACHAIRWIND OFFSHORE WIND FARM (REFERENCES: 00012385 / 00012386)
Date:	28 September 2026 14:02:55
Attachments:	ScotGov Official Report.pdf

SUBJECT: FORMAL OBJECTION TO SECTION 36 CONSENT AND MARINE LICENCE APPLICATIONS FOR THE MACHAIRWIND OFFSHORE WIND FARM (REFERENCES: 00012385 / 00012386)

Dear Sir / Madam,

I am writing to formally object to the Section 36 Consent Application submitted by ScottishPower Renewables (SPR) for the proposed MachairWind Offshore Wind Farm.This objection completely rejects the applicant's core argument that the economic benefits, biodiversity enhancements, and "strategic energy need" of this development outweigh its severe environmental, cultural, and localised socio-economic harms.

This counter-argument is directly supported by expert testimony delivered to the Scottish Parliament on 1 September 2026 by Professor Sir Dieter Helm, Professor of Energy Policy at the University of Oxford. Professor Helm's analysis exposes the applicant's "strategic need" and "cheap energy" narratives as fundamentally detached from Scotland's actual economic and grid realities. The official Scottish Parliament TV Video Broadcast can be viewed online but I have appended after this letter of objection the full transcript.

Procedural Objection: Prejudicial Deficit of Transparency

Before addressing the substantive flaws in the application, I must raise again a critical procedural objection. Members of the public are currently being forced to comment in an absolute vacuum of information.To date, the Marine Directorate (MD) has not made any consultation responses available to the public. Furthermore, the public is entirely unaware of which statutory consultees are being, or have been, consulted on this Environmental Impact Assessment (EIA) aspect, because the MD has failed to publish or list the 'Outgoing Consultation Requests'. Forcing stakeholders to evaluate complex economic and environmental trade-offs without access to statutory feedback or a clear view of the consultation process is deeply prejudicial and undermines the democratic legitimacy of the planning system.

1. Demolishing the "Strategic Need" Narrative (Grid Overcapacity)

In its EIAR Non-Technical Summary (NTS), the applicant asserts that the project's "generating capacity of around 2 GW of electricity" is "critical to ensuring that Scotland and the UK can meet their binding energy and climate change targets", citing the Scottish Government's ambition of deploying up to 40 GW of new offshore wind capacity by 2040.

Parliamentary evidence proves this extra capacity is entirely redundant for domestic needs and structurally misplaced:

The Massive Grid Gulf:
As detailed in the Official Report, Professor Helm highlighted that Scotland's energy strategy aims for 20GW of additional renewables by 2030, yet Scotland's peak domestic energy demand is only about 5GW and has been steadily declining from 6–7GW in 2010.

Built Solely for Export:
Because the gulf between installed capacity and actual Scottish need is vast, Scotland's energy system is primarily directed at exporting power southward.

Disproportionate Local Sacrifice: Siting a massive, visually intrusive offshore wind farm 7.7 miles from fragile island communities provides zero domestic grid utility to Scotland. It forces local communities to bear 100% of the environmental and economic degradation for an unbacked export commodity.

2. Refuting the Myth of "Homegrown Energy Security" and Lower Costs

The applicant claims that expanding its renewable capacity supports "green energy independence", lowers the "cost of energy", and protects against "global market shocks" caused by importing over 40% of energy requirements. Expert evidence directly refutes this:

The Highest Costs in the Developed World:
Despite Scotland's surge in wind capacity, UK electricity remains about the most expensive in the developed world. High power prices have driven massive de-industrialisation across the Clyde, Grangemouth, and the wider UK.Inability to Attract Industry: Industrial demand for electricity is collapsing. Energy-intensive industries are actively bypassing Scotland for the US (where energy prices are four times lower) and China (where they are two times cheaper). MachairWind will not reverse this trend or anchor local manufacturing.The "Intermittent Surplus" Dilemma: Professor Helm raised critical questions regarding who will actually pay for this power. When the wind blows, the entire UK and Northern Europe will experience massive energy surpluses simultaneously. As Professor Helm warned: “It does not much matter how much a solar panel or a wind turbine costs per se; the question is about the cost to the system of having those things.” MachairWind will produce unmarketable, heavily constrained power while driving up the overall system costs paid by consumers to manage grid intermittency.

3. Exposing the Flawed "Nature Positive" and "Socio-Economic" Claims

The applicant highlights its Nature Positive Plan and a Socio-economic Action Plan (SEAP, backed by BiGGAR Economics) to claim it will maximize benefits for host island communities, Argyll and Bute, and support biodiversity enhancement.

Shades of Clean and Dirty: Parliamentary testimony reminds us that "renewables are also not clean." Looking at the carbon-intensive global mineral supply chains and manufacturing processes required to build 335-metre turbines, the net environmental benefit is heavily diluted. A localised "Nature Positive Plan" cannot mask the massive disruption to marine ecology during construction.

Uncommitted Local Benefits:
SPR’s SEAP sets out "scenarios" rather than concrete, legally binding commitments. The local economies of Mull, Iona, Colonsay, and Islay rely heavily on eco-tourism and pristine seascapes. By failing to accurately account for the severe visual degradation caused by industrializing these waters, SPR has vastly underestimated the resulting downturn in tourism revenue.

NPF4 Policy 7 Violations:
It is unacceptable to use a flawed narrative to override the explicit protections outlined in National Planning Framework 4 (NPF4) Policy 7. The irreversible damage to the historic settings of Iona Abbey, and the severe visual impact on tourism-dependent island economies, cannot be traded off against a project that adds redundant, highly intermittent power to an already oversaturated export system.

Conclusion

As established before the Scottish Government’s own committee, adding more uncoordinated offshore wind capacity does not guarantee a successful economic transition, cheaper bills, or domestic energy security. Instead, it drives up system costs while exporting the financial yields out of the country.

Because the applicant’s claims of overriding public, environmental, and economic benefit have been comprehensively dismantled by independent expert analysis—and because the process itself lacks basic regulatory transparency—the statutory balance swings firmly against this development. I urge the Marine Directorate to uphold Scotland's planning policies and refuse consent for the MachairWind application.

Please acknowledge receipt of this formal objection.

Yours faithfully,

[Redacted]

Sent from AOL on Android

By Email: md.marinerenewables@gov.scot
By Post: Marine Directorate – Licensing Operations Team (MD-LOT), Scottish Government, 375 Victoria Road, Aberdeen, AB11 9DB

Date: 3 November 2026

RE: FORMAL OBJECTION – SECTION 36 CONSENT APPLICATION FOR THE PROPOSED MACHAIRWIND OFFSHORE WIND FARM (WINDFARM DEVELOPMENT AREA) – APPLICATION REFERENCES: 00012385 & 00012386

To Whom It May Concern at the Marine Directorate Licensing Operations Team,

I am writing to register my formal objection to the Section 36 application submitted by ScottishPower Renewables (SPR) for the construction and operation of the 2-GW MachairWind offshore wind farm project located northwest of Islay and west of Colonsay.

I submit this formal representation within the specific, extended public objection window officially granted to me by the Marine Directorate. Please be advised that a full copy of this objection is being provided directly to the Planning Department at Argyll and Bute Council to establish a unified public record and to complement their existing statutory objection. Furthermore, I wish to formally register my request to be notified of, and permitted to participate in, any forthcoming reporter-led examination process, hearing sessions, or associated public sessions held in relation to this development.

The basis of my objection turns on a profound material change in UK economic and energy policy that fundamentally undermines the project's socio-economic case and establishes clear procedural prematurity. On 28 October 2026, Chancellor John Healey announced a comprehensive Cost Control Framework (CCF) designed to eliminate the multi-billion-pound "wasted wind" constraint fee burden funded by consumer levies. While this framework is scheduled for full integration into the 2027 spending review, the Chancellor confirmed that its principles take effect immediately, dictating that upcoming clean electricity allocation rounds will strictly veto or deprioritise projects that cannot connect to the grid efficiently or would drive up consumer bills.

The MachairWind project fails this new national procurement mandate on two core grounds:

1. Fundamental Deficiency of the Socio-Economic Case

The applicant’s socio-economic justification relies entirely on the premise that a 2-GW array will deliver cost-effective green energy and long-term regional economic benefits. However, the physical reality of the transmission architecture between the West of Scotland and major southern demand centres means that the National Grid cannot accommodate this load. It routinely forces costly curtailment actions. Because fixed-bottom offshore wind installations suffer from vastly higher capital and construction costs than onshore alternatives, MachairWind is exposed to an immediate veto under the Treasury's cost-efficiency guidelines. If the project is

denied a state Contracts for Difference (CfD) subsidy contract, its commercial viability disappears. The promised local supply chains, regional employment opportunities, and island community funds will not materialise. Approving an asset with such an acute risk of becoming a stranded macro-economic failure is entirely contrary to the public interest.

2. Procedural Prematurity and Infrastructure Misalignment

It is entirely premature for the Marine Directorate to recommend a final planning consent decision in 2027. The project intends to export its immense 2-GW capacity via subsea cables to a landing point near Girvan in South Ayrshire. However, the applicant has split its submission, leaving the critical export cable corridor and onshore infrastructure permits to a speculative, separate future application. Advancing the main offshore array while the recipient transmission infrastructure remains severely bottlenecked directly contradicts the National Energy System Operator's upgraded focus on localised grid readiness. The project's build window is completely captive to the pace of independent grid upgrades that are outside the scope of this application.

To illustrate these systemic misalignments, I request that the Directorate reviews the following comparative matrix detailing the friction between the project's schedule and transmission realities:

Milestone Phase	MachairWind Proposed Timeline	National Grid Transmission Reality	Socio-Economic / Prematurity Impact
Planning Consent Decision	Anticipated 2027	NESO "First Ready, First Needed" grid integration reforms are fully active.	**Premature Consent:** Consent is sought before the recipient localised network has proven it can legally absorb the power load.
Subsidy Procurement	Upcoming CfD Allocation Rounds (Late 2020s)	Strict Cost Control Framework (announced 28 Oct 2026) filters out high-cost, grid-lagging assets.	**Funding Risk:** High offshore capital expenditure creates a direct vulnerability to a Treasury veto due to constraint fee exposure.
Onshore / Cable Infrastructure	Post-Consent Permitting Phases	Separate future permits required for the Girvan export corridor. Macro bottlenecks remain south of Ayrshire.	**Fragmented Planning:** Onshore constraints and network capacity remain entirely unresolved at the time of this main offshore determination.
First Power & Delivery Window	Early to Mid-2030s	Dependent on the construction of extensive subsea and overland macro-grid reinforcement links to southern England.	**Speculative Schedule:** The commissioning timeline is entirely captive to external National Grid upgrade delays.

Conclusion

The planning system must not be used to grant speculative consent to a 2-GW array that faces immediate deprioritisation by the Treasury and cannot be integrated into the network without penalising energy consumers. I formally urge the Marine Directorate to recommend the refusal of this application, or to defer any final decision until the applicant can conclusively prove localised grid readiness. I look forward to receiving confirmation of this objection and being kept informed regarding the upcoming reporter-led examination process or any associated public sessions.

Yours faithfully,

[Redacted]

CC: Argyll and Bute Council Planning Department

Member of the Public 4915

From: [Redacted]
To: MD Marine Renewables
Subject: Fwd: MachairWind Project Colonsay Iona islay
Date: 26 June 2026 14:49:41

---------- Forwarded message ---------
From: [Redacted]
Date: Fri, 26 Jun 2026 at 15:15
Subject: MachairWind Project Colonsay Iona islay
To: [Redacted]

Dear [Redacted]

This is from [Redacted] part of Tiree Community Council (TCC) , thanks for meeting you both at times on Tiree, but it is being sent as my own personal view on the proposed Machair Wind development off Iona and Colonsay and Islay.

For your information you will receive a letter from TCC on this project. TCC did request feed back from the island but only 7 people commented of which 5\7 => - 71%- were against it.

My views are :

1. We do require more Windpower - but NOT at the expense of the Environment so special in the Hebrides

2. This is "opportunist" of the developer as they can see being close to Colonsay gives them a reduction costs

3. If this development goes ahead it potentially opens up the whole Hebridean sea to more developments and turns a special part of the world into a nightime of flashing red lights- eg we " industrialise the hebrides in order to provide power for data centres - We need to protect what we have.

4. The so called Tiree Array was cancelled due to protest and quite likely cost implications for the developer- Now it seems the developer keeps looking for a better cost opportunity- eg really close to an Island.

I hope you can step in and not sacrifice the Hebridean skyline

I include a link to https://www.hebrideanhorizon.co.uk/ - this site spells it out clearly

Thanks and regards

[Redacted]

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	Objection to Machair Windfarm
Date:	26 July 2026 20:17:10

"md.marinerenewables@gov.scot" <md.marinerenewables@gov.scot>

Dear Scottish Government,

I am a Tiree Resident

Firstly I praise you for commitment to Green Energy- We need it as France and Spain Burn and heatwaves roll out. We very much need to replace fossil fuels- but not at the expense of the environment we still have left

Please consider the massive environmental damage that the planned wind turbine development off Colonsay will inflict.

Whilst it has potential to produce large amounts of electricity (enough to power a few Data centres perhaps). I hope sense and sensibility will reign on the decision not to allow this development to proceed.

The Hebrides Island and sea are some of last inhabited wilderness of the UK. They are jewel in Scotland's crown.

The issues are:

1. Visual impact-This is massive - eg would this development be permitted offshore or onshore in any other stunningly beautiful area- Or is it just convenient that the population level is low so it can be bulldozed through. would it be even considered offshore 12 miles from Land in Cornwall or Devon ?
A forest of blinking red lights and whirling blades

2. Marine life- Only two years ago much of the sea around the Hebrides was being considered to become a Marine Protected Area, MPA- The area round Tiree and Coll was considering banning small local fishing vessels- Yet now we consider building giant platforms - and laying cables ripping up the seabed. Minke whales, Dolphins and Basking sharks dont follow maps- neither does all the other marine life - It will either die or move away for good- So much for looking after our environment

3. Birdlife - It will be minced- Recently Tiree Community council received an offer from a Windfarm developer to eradicate all the Rats on Tiree in return they would use the Tiree bird life that this would " apparently save" as Bird death credits for a windfarm else where- Tiree community council turned down this outrageous offer.

We are all aware of the importance of the Hebrides for birds- so save it now while we still have it

4. Iberdrola SPR Profit- A number of years ago SPR wanted to build the so called Tiree Array- It thankfully did not go ahead- >Partly due to protest and awareness of how many Northen Divers birds would be killed - and partly we think due to the difficulty of building the Turbines in the rough seas and the seabed offshore Tiree. The area offshore Colonsay will prove easier to build on and hence is pure " Opportunist" development by SPR . There is nothing altruistic in the plans by SPR only for maximum profit- Relatively

shallow water , not to rough sea and close to a land base- easy money. Build it further away over the horizon and costs soar, but its feasible

5. Local impact- Loss of tourism , fishing ,and community- Its a fragile economic existence on the Island - and please no cheap bribes from SPR with a bit of money and a few jobs offered- we dont want it- Consider the American Indian view- We belong to the land, not the land to us.- We are caretakers not owners

6. Special area of wilderness- We dont have that much left - this will destroy it, forever- then do we look back and say " its gone"

7. I appreciate that as caretakers we need to do something about global warming but this development destroys and environment- build it offshore in North sea-
Don't Industrialize what we still have left - The Hebrides is a special area of Scotland

In summary - Please dont build it- on a final note perhaps you should consider listening to to the Joni Mitchel song Big Yellow taxi- The word they paved paradise and put a parking lot are meaningful here. I have copied and pasted the lyrics below.

The lines sum it up:

Don't it always seem to go
That you dont't know what you've got 'til it's gone ?

Don't it always seem to go
That you don't know what you've got 'til it's gone?

Yours sincerely,

[Redacted]

Thanks to Joni Mitchel

Joni Mitchell Lyrics

Follow Joni Mitchell
on Bandsintown

"Big Yellow Taxi"

They paved paradise
Put up a parking lot
With a pink hotel, a boutique
And a swinging hot spot

Don't it always seem to go
That you don't know what you've got 'til it's gone?
They paved paradise
Put up a parking lot

They took all the trees
Put 'em in a tree museum
Then they charged the people
A dollar and a half just to see 'em

Don't it always seem to go
That you don't know what you've got 'til it's gone?
They paved paradise
Put up a parking lot

Hey, farmer, farmer
Put away that DDT now
Give me spots on my apples
But leave me the birds and the bees
Please!

Don't it always seem to go
That you don't know what you've got 'til it's gone?
They paved paradise
Put up a parking lot

Late last night I heard the screen door slam
And a big yellow taxi took away my old man

Don't it always seem to go
That you don't know what you've got 'til it's gone?
They paved paradise
Put up a parking lot

I said
Don't it always seem to go
That you don't know what you've got 'til it's gone?
They paved paradise
Put up a parking lot

They paved paradise
Put up a parking lot
They paved paradise
Put up a parking lot

Member of the Public 4916

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to MachairWind offshore wind farm proposal
Date:	13 August 2026 11:43:44
Attachments:	drawing.png

I write to object to the proposed offshore wind development in the waters around the Inner Hebrides, as follows:

This development would devastate these seas causing harm to their unique population of animals such as dolphins, whales, porpoises, sea birds and migrating birds.

The huge scale of these proposed turbines would for ever change the whole area into an industrial site, away from being an area of natural beauty and historical importance e.g remembering Columba's journey to Iona and the huge cultural shifts that have grown from that.

The proposed development would threaten the fragile tourism and fishing economies that sustain these remote island populations, bringing economic, social and ecological damage, harming the way of life of local people with no benefit to them.

This development echoes historical patterns where the powers-that-be appropriate assets and land for financial gain and in the process local populations suffer hardship e.g as in the Highland Clearances. Schemes are needed that support a just transition from fossil fuel to green energy, and that cause minimal damage to local populations; such as extending the grid infrastructure which is not at present able to distribute energy currently being generated in Scotland.

The huge scale of this project would permanently industrialise these seas for ever with immeasurable loss, as described above.

[Redacted]

12 The Square, Ashfield, Dunblane, FK15 OJN
Friend of the Iona Community
Privileged to have had a life long enjoyment of Scotland's rich natural and cultural heritage

12 August, 2026

Sent from my iPad

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to MachairWind off shore wind farm proposal
Date:	10 August 2026 12:48:26

I write to object to the proposed offshore wind development in the waters around the Inner Hebrides, as follows

This development would devastate these seas with harm to their unique population of animals such as dolphins, whales, porpoises, sea birds, migrating birds.
The huge scale of these proposed turbines would for ever change this whole area to an industrial site from being a place of natural beauty and historical and cultural importance eg Columba's journey to Iona.
The proposed development would threaten the fragile tourism and fishing economies that sustain these remote island populations, bringing economic, social and ecological harm with no clear benefit to people in these islands while harming their way of life.
This development echoes historical patterns

Sent from my iPhone

Member of the Public 4917

From: [Redacted]
To: MD Marine Renewables
Subject: Machir wind farm project
Date: 30 July 2026 09:59:47

I live on the Isle of Jura in the Hebrides and have attended the community events regarding this project and would like to express my support for the project. Climate change is terrifyingly real and we need to get to net zero asap unless we all decide to stop using electricity. This project appears to be well researched from an environmental perspective and will have minimal negative effects on wildlife.

[Redacted]

Isle of Jura

Member of the Public 4918

From: [Redacted]

Sent: 14 August 2026 08:58

To: Representations Mailbox <representations@gov.scot>

Subject: Machair wind farm OBJECTION

Sirs
OBJECTION to Machair Wind Farm
I totally object to the Machair Wind Farm on the grounds of ecological vandalism and economic stupidity.
Sincerely

[Redacted]

Member of the Public 4919

From:	**[Redacte**
To:	MD Marine Renewables
Subject:	Objection to Machair Windfarm - Marine Directorate references 00012385/00012386
Date:	16 August 2026 23:43:17

I write to object to the application for Section 36 Consent for the Construction and Operation of the proposed MachairWind Offshore Wind Farm.

This development would install between 91 and 144 turbines with a blade tip height of up to 335 metres, within an area of around 448 square kilometres. The closest point of the site lies approximately 13 miles from Iona and 8 miles from Colonsay, placing turbines of this scale far closer to inhabited coastline than is typical for offshore wind development of this size elsewhere in the UK. A turbine of 335 metres is taller than the Eiffel Tower, so this development would be easily visible as a large industrial feature across a previously undeveloped sea.

The neighbouring islands have fragile economies and tourism is a vital component of these economies. Tourists are attracted to these islands by the peace and quiet, the scenery and the heritage. They will not come to these islands if this development goes ahead and dominates the view.

Iona is internationally significant due to it's 1,500 years of religious and cultural history. The sense of remoteness and simplicity has drawn visitors for centuries. They will be deterred from coming if this giant windfarm is constructed a few miles offshore.

For the above reasons this development poses tremendous risk to the island economies and to Scotland's heritage. I urge that it be refused.

[Redacted]

Member of the Public 4920

From:	**[Redacted]**	
To:	MD Marine Renewables;	**[Redacted]**
Subject:	Objection Machair Windfarm	
Date:	25 July 2026 17:15:03	

To Whom It May Concern,

I write to formally object to the proposed MachairWind Offshore Wind Farm.

I fully support Scotland's transition towards renewable energy and recognise the important role offshore wind has to play in achieving our climate ambitions. However, I do not believe this proposal is appropriate for this location due to its likely adverse effects on the landscape, seascape, wildlife, tourism economy and the special qualities that make the west coast of Scotland internationally renowned.

As the owner and operator of Alan Stevenson House Hotel at Hynish on the Isle of Tiree, I have first-hand experience of the reasons people choose to visit and stay on Tiree. Visitors travel from across the United Kingdom and around the world to experience the island's tranquillity, outstanding natural beauty, exceptional wildlife, dark skies and uninterrupted coastal scenery. These qualities are not simply attractive features; they are the foundation of our local economy and support businesses, employment and the long-term sustainability of our island community.

One of Tiree's defining characteristics is its uninterrupted panoramic outlook across the Atlantic Ocean and the Hebridean Sea. From Hynish, our guests enjoy expansive views of open water and distant islands that have remained largely unchanged for generations. The proposed development would introduce an extensive industrial installation into what is currently one of Scotland's most iconic and unspoilt seascapes. Rather than viewing an open horizon, visitors could instead experience a landscape punctuated by an array of very large offshore wind turbines, fundamentally changing the character of these views.

I am particularly concerned about the visual impact from Tiree. The proposed turbines are of an unprecedented scale and there is a significant possibility that they will be clearly visible from many locations across the island in suitable weather conditions. The cumulative effect of such a large number of turbines has the potential to alter the character of Tiree's internationally recognised seascape and diminish the sense of remoteness, openness and wildness that attracts so many visitors.

The Environmental Impact Assessment must therefore include robust and realistic visualisations from representative viewpoints across Tiree, including Hynish and other publicly accessible coastal locations, to allow local communities and decision-makers to fully understand the true visual impact of the development.

I am equally concerned about the impact on Tiree's exceptional dark skies. Due to the height of the proposed turbines, aviation obstruction lighting is likely to be required. The cumulative effect of numerous red warning lights visible across the horizon throughout the hours of darkness would erode one of Tiree's most valued natural assets. The island is recognised for its exceptionally low levels of artificial light pollution, providing residents and visitors with remarkable night skies and outstanding opportunities for stargazing. This peaceful night-time environment is increasingly rare and forms an important part of Tiree's identity and visitor appeal. The permanent introduction of aviation lighting across the horizon would fundamentally alter this experience.

Tourism is one of the principal economic drivers for Tiree, Iona, Mull and the wider

Hebridean islands. Hotels, restaurants, guest houses, self-catering businesses, wildlife tour operators, boat trips, retail businesses and many other small enterprises depend upon the area's reputation for spectacular scenery, abundant wildlife and an unspoilt environment. Any reduction in the area's attractiveness, or the perception that its unique landscapes have become industrialised, risks having direct economic consequences for businesses, employment and investment across fragile island communities.

I am also concerned that the communities expected to experience the greatest visual, environmental and economic impacts from this development appear likely to receive relatively little direct benefit in return.

Tiree, Iona, Mull and the surrounding Hebridean islands would bear many of the consequences of this proposal through changes to their landscape, seascape, dark skies and visitor experience, yet there is little evidence that the development will deliver significant long-term employment, meaningful investment in local infrastructure or reduced electricity costs for our island communities. Most construction activity and specialist maintenance are likely to be undertaken by contractors based elsewhere, with only a limited number of permanent operational roles remaining locally.

Furthermore, the electricity generated by this development will become part of the wider Great Britain transmission network rather than being supplied specifically to the communities most affected by the project. While I recognise the importance of contributing to national energy security and net-zero ambitions, it is difficult to justify imposing such significant and permanent impacts on fragile island communities when the direct local economic and energy benefits appear comparatively limited.

Island communities should not simply become hosts for nationally significant infrastructure without receiving a fair and proportionate share of the long-term benefits. Any proposal of this scale should clearly demonstrate tangible and lasting economic advantages for the communities whose landscapes, businesses and livelihoods will be most affected.

I also have significant concerns regarding the potential impact on wildlife. The waters surrounding Tiree, Iona and Mull support internationally important populations of seabirds, migratory birds, marine mammals, basking sharks and other protected species. While mitigation measures may be proposed, there remains uncertainty regarding the cumulative effects of a development of this scale throughout construction, operation and maintenance. Where uncertainty exists regarding internationally important habitats and protected species, the precautionary principle should be applied.

Furthermore, insufficient weight appears to have been given to the cumulative impact of this and other renewable energy developments on Scotland's west coast. Individually, each proposal may appear acceptable; collectively, however, they risk fundamentally changing the character of one of Europe's most celebrated coastal landscapes.

The proposal also fails to adequately recognise the cultural and historic significance of the surrounding landscape. The seascape connecting Tiree, Coll, Mull and Iona forms an integral part of the identity and heritage of the Inner Hebrides. Once altered by a development of this scale, that sense of place cannot be restored.

I respectfully ask Scottish Ministers and the determining authority to give full consideration to the long-term economic importance of tourism, the protection of Scotland's nationally important seascapes, the preservation of Tiree's dark skies, the conservation of internationally significant wildlife and the interests of businesses whose livelihoods depend upon maintaining the exceptional environmental qualities of this

region.

For these reasons, I respectfully request that consent for the proposed MachairWind Offshore Wind Farm be refused unless it can be conclusively demonstrated that there will be no unacceptable impacts on landscape, seascape, visual amenity, dark skies, wildlife, cultural heritage, tourism or the long-term sustainability of island economies.

Scotland's transition to renewable energy is essential, but it must be delivered in locations where environmental and economic impacts are genuinely acceptable. The west coast of Scotland—and in particular the unique seascapes surrounding Tiree, Iona and Mull—is among our nation's greatest natural assets. These landscapes, together with the communities and businesses that depend upon them, deserve the highest level of protection for future generations.

Yours faithfully,

[Redacted]

Sent from Outlook for iOS

Member of the Public 4921

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	Ref 00012385 / 00012386. MachairWind offshore wind farm
Date:	14 August 2026 17:44:39

To: Marine Directorate

Via email to MD.MarineRenewables@gov.scot

Objection to MachairWind offshore wind farm

14 August 2026

Dear Sirs

Ref 00012385 / 00012386. MachairWind offshore wind farm – encompassing 448 km² of sea, and consisting of between 91 and 144 turbines up to 335 metres high, located within 6 miles of the Isle of Colonsay

I have been visiting Colonsay at least annually for the last 25 years. A prime reason for returning again and again is the island's special character, where time often seems to stand still. Of pivotal importance is the peace and tranquility and the fact that the trappings of modern life and industrialisation can be left behind.

The vistas to the west are very special. There is no avoiding the reality that, if given the go-ahead, this uninterrupted seascape would be overwhelmed and obliterated by what would amount to an industrial park of unprecedented scale. Even the developers concede that the visual impact from Colonsay would be significant.

If the plans come to fruition, I would certainly stop visiting Colonsay. I know many who feel the same way. Scottish Ministers may consider this unimportant – but that is missing the point. Tourism is the mainstay of Colonsay's economy and if regular/loyal visitors fail to return, then the implications are devastating. Without a thriving tourist economy, the island will surely go into medium-term decline and increased depopulation.

I urge Scottish Ministers to reject the application.

Yours faithfully

[Redacted]

Member of the Public 4922

From:	**[Redacted]**
To:	MD Marine Renewables; MD Marine Licensing
Subject:	Formal Objection to Marine Licence Application 00012385 – MachairWind Offshore Wind Farm
Date:	14 August 2026 23:06:47

Dear Sir / Madam

Please find below a passionate and heartfelt objection to MachairWind's proposal for an Offshore Wind Farm (Marine Licence Application 00012385).

My husband and I have been residents on the Isle of Mull since 2013 and have fallen deeply in love with its landscape, people, wildlife and history – and that of the surrounding islands.

We are horrified that this proposal has been put forward and ask that it is dismissed immediately, to avoid irreparable damage to the beauty, ecology, heritage and natural history of this world-class site.

I would appreciate confirmation of safe receipt from yourselves.

Yours faithfully

[Redacted]

Retired Special Educational Needs Coordinator, Surrey County Council

[Redacted]

FORMAL REPRESENTATION OF OBJECTION

Marine Licence Application 00012385 – MachairWind Offshore Wind Farm

Submitted to: Marine Directorate – Licensing Operations Team

Submitted by: **[Redacted]** Resident of the Isle of Mull (Victoria Cottage, Breadalbane Street, Tobermory, Isle of Mull PA75 6PE)

INTRODUCTION

I respectfully object to Marine Licence Application 00012385 for the proposed MachairWind Offshore Wind Farm.

To be clear, I support Scotland's transition towards renewable energy and acknowledge the importance of offshore wind in achieving national climate objectives. However, it seems that renewable energy policy presumes that

offshore wind proposals be approved, irrespective of environmental consequences.

The Marine Directorate has a statutory duty to ensure that marine licensing decisions comply with environmental legislation, marine planning policy and the precautionary principle.

In my strong and considered opinion, the applicant has not demonstrated that the proposal satisfies these requirements.

The information currently available leaves significant uncertainty regarding impacts upon internationally-important marine habitats, protected bird populations, landscape and seascape character, cultural heritage, tourism and local communities.

Where such uncertainty exists, the 'Precautionary Principle' requires Refusal unless adverse effects can be excluded with confidence.

Please see below the main tenets of my formal objection:

1. **LEGAL FRAMEWORK**

The Marine Directorate is required to determine this application in the context of Regulation that includes (but that is not limited to):

- Marine (Scotland) Act 2010
- UK Marine and Coastal Access Act 2009
- Conservation (Natural Habitats etc.) Regulations
- Nature Conservation (Scotland) Act 2004
- Climate Change (Scotland) Act
- National Marine Plan
- National Planning Framework 4
- Scottish Biodiversity Strategy
- International obligations arising under the Convention on Biological Diversity and relevant bird conservation agreements.

The existence of national climate objectives does not override these statutory duties.

Rather, environmental protection and climate mitigation must be balanced in accordance with the law.

2. **THE PRECAUTIONARY PRINCIPLE**

One of the fundamental principles underpinning environmental decision-making is the so-called 'Precautionary Principle'.

Where significant uncertainty remains regarding adverse environmental effects, consent should not be granted merely because impacts have not yet been

conclusively demonstrated.

The burden rests with the applicant to demonstrate that unacceptable impacts are unlikely to occur. I believe it is obvious even to the non-expert layman that, in the context of Marine Licence Application 00012385, this burden has not been discharged.

3. IMPACT UPON PROTECTED BIRD SPECIES

The West coast of Scotland supports internationally-recognised populations of seabirds and birds of prey.

These include species protected under domestic legislation and international conservation agreements.

Potential impacts include:

- collision mortality;
- displacement from feeding grounds;
- barrier effects;
- cumulative mortality;
- disturbance during construction;
- indirect food-web effects

Of particular concern are cumulative effects across multiple offshore wind developments.

Even where individual projects predict relatively small increases in mortality, cumulative effects may become ecologically significant.

The Environmental Impact Assessment appears to rely heavily upon predictive modelling.

While modelling is essential, it cannot substitute for certainty where internationally-important populations may be affected.

4. CUMULATIVE EFFECTS

In my opinion, the greatest weakness of the proposal concerns cumulative impact assessment.

Marine developments cannot properly be assessed in isolation.

The West coast is now subject to an increasing number of offshore renewable proposals.

The cumulative consequences extend beyond ecology to include:

- seascape character;

- tourism;
- fishing;
- navigation;
- visual amenity;
- community wellbeing

Incremental industrialisation can fundamentally transform regional character even where individual developments appear acceptable.

Decision-makers should therefore assess cumulative impacts at the landscape scale rather than project-by-project. I do not believe that this has been taken into account in this proposal.

5. LANDSCAPE AND SEASCAPE

The waters surrounding Mull and Iona represent one of Scotland's most iconic coastal environments.

Their value derives not simply from scenic beauty but from their universally-recognised sense of openness, wildness and remoteness.

Large offshore turbines exceeding 300 metres in height inevitably become dominant visual features, even in adverse weather conditions.

The cumulative introduction of hundreds of such structures risks permanent industrialisation of what remains one of Europe's finest coastal landscapes. Such impacts cannot realistically be mitigated.

6. CULTURAL HERITAGE

Iona is internationally-recognised for its religious, archaeological and historical importance.

The island's significance extends well beyond its scheduled monuments.

Its wider setting forms an integral component of its Outstanding Universal cultural value.

Historic landscapes must be understood as delicate, organic and ***fragile*** relationships between land, sea and history.

Introducing major industrial infrastructure into this setting risks eroding cultural significance in ways that cannot readily be quantified – and, potentially, cannot be reversed.

7. TOURISM

Tourism supports many thousands of livelihoods across Argyll and the Hebrides.

Visitors are attracted by:

- internationally recognised scenery;
- wildlife;
- tranquillity;
- dark night skies;
- cultural heritage.

These qualities represent valuable economic assets.

The Environmental Impact Assessment places considerable emphasis upon temporary construction benefits while giving comparatively less weight to potential long-term effects upon tourism. Accordingly, this project should be shelved immediately and this patent imbalance should be reconsidered carefully.

8. EFFECTS ON COMMUNITIES

If this project goes ahead, island communities will bear disproportionate environmental cost whilst receiving relatively-limited direct economic benefit.

Meaningful consideration must, therefore, be given to:

- community well-being;
- quality of life;
- recreational amenity;
- cultural identity;
- public confidence.

These matters are legitimate planning considerations and should not be dismissed as merely subjective.

9. ENVIRONMENTAL ASSESSMENT

I remain utterly unconvinced that sufficient evidence has been presented regarding:

- cumulative ecological impacts;
- long-term monitoring;
- adaptive management;
- climate resilience;
- uncertainty in collision-risk modelling;
- interactions with future offshore developments.

Environmental Impact Assessment is intended to inform decisions rather than justify predetermined outcomes – consequently, where uncertainty remains substantial, further in-depth assessment is essential before consent is even considered.

10. PUBLIC PARTICIPATION

The Aarhus Convention emphasises effective public participation in environmental decision-making.

Applications of this scale involve many thousands of pages of technical documentation and, while legally available, such material is often inaccessible to ordinary members of the public.

Meaningful consultation requires information to be understandable as well as technically available. I do not believe that this objective has been achieved.

CONCLUSION

I believe that Scotland can and should lead a transition to renewable energy.

However, achieving net-zero ***must not*** come at the unnecessary expense of internationally-significant biodiversity, exceptional coastal landscapes and irreplaceable cultural heritage.

The Marine Directorate's responsibility is not simply to facilitate renewable energy development but to ensure that each proposal satisfies the legal tests established by Parliament.

In my respectful submission, the applicant has failed to demonstrate that:

- adverse effects upon protected species can be excluded with sufficient certainty;
- cumulative impacts have been adequately assessed;
- landscape and seascape impacts are acceptable;
- cultural heritage has been adequately protected;
- impacts upon tourism and island communities have been properly evaluated.

For these reasons, I respectfully request that Marine Licence Application 00012385 be refused.

Furthermore, should the Marine Directorate nevertheless be minded to grant consent, I submit that it would first require substantial further environmental assessment, independent review of cumulative impacts, and robust monitoring and mitigation measures capable of ensuring compliance with Scotland's environmental obligations.

Respectfully submitted,

[Redacted]

Member of the Public 4923

Objection to the Proposed MachairWind Offshore Wind Farm

As a regular visitor to the Ross of Mull and the islands within sight of the proposed MachairWind development, I write to object to this application.

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. Why I am writing: a visitor's perspective

I am not a resident of these islands, and I do not pretend to speak for them. I write as [someone who has visited this coast every year for the past [X] years / a frequent visitor to this coast since [year]], and I want the Ministers to understand what draws people like me back, again and again, because it is precisely what this application would take away.

I come here for what the wider landscape does to a person: an open Atlantic horizon uninterrupted by anything built by human hands, dark skies undimmed by artificial light, and a stillness that has become rare almost everywhere else. That is not a minor amenity. It is the whole reason to come, and it is exactly what the people who live here depend on for their livelihood, whether they run a guesthouse, a shop, a boat trip, or simply share their home with visitors like me for a season.

I know that if this development goes ahead, I would stop coming. Not as a protest, but because what I come for would no longer be there to find. A visitor looking out at 144 turbines, some as tall as 335 metres, standing permanently across that horizon is not looking at the island the communities objecting to this proposal are trying to protect. If people like me stop coming, in the numbers the applicant's own consultants concede cannot be ruled out, that loss falls first and hardest on the very island communities this application has never properly assessed.

3. What I am asking

I am asking the Scottish Ministers not to let that happen to people who have done nothing to deserve it, and who have already told the Ministers, in detail and at length, exactly what is at stake. I ask the Scottish Ministers to refuse consent under section 36 of the Electricity Act 1989, and I ask the Marine Directorate to refuse the associated marine licences under Part 4 of the Marine (Scotland) Act 2010.

Conclusion

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I object to the proposed MachairWind Offshore Wind Farm and ask that consent be refused.

[Redacted] former resident on Erraid and frequent visitor to the Ross of Mull and the surrounding islands.

With kind regards,

[Redacted]

Member of the Public 4924

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	MachairWind 00012385/00012386- Objection to Impact on Cultural Heritage Assets and Context.
Date:	08 August 2026 22:32:04

Please find below my Objection Re: MachairWind 00012385/00012386- Objection to Impact on Cultural Heritage Assets and Context.

Dear Sir, Madam

Regarding MachairWinds failure to recognise the significance of Iona.

If the proposed MachairWind offshore windfarm is built, the experience of visiting Iona for the many millions of pilgrims will be fundamentally altered. Lest we fail to note, for many visitors and pilgrims, the journey is an exceptionally long one, often spanning thousands of miles. The final leg across the Isle of Mull conveys a growing sense of remoteness, feeling almost like a journey through time. A single-track road winds through the rugged grandeur of Glen More. A palpable sense of remote rural wilderness, a landscape little changed, a natural rural landscape of lochs, sea, and coastline dotted with traditional slate roofed crofts, smallholdings, and farms. To the right, the distant Treshnish Isles and Staffa rise from the open sea dotted with a few tiny fishing boats. At Fionnaphort the single track road meets a small parking area which lead down to the slipway. The subsequent ferry crossing traverses an open stretch of turquoise waters framed by an unspoilt, natural, rolling pink granite coastline. Ahead lies a village cluster of traditional cottages nestled along a sandy shoreline beneath the open sky. It feels simple and timeless, the sea, land and sky. It is a small, precious jewel of a place.

Perhaps the windfarm builder failed to point out the national and international importance of such a tiny, iconic place. The setting is special and sometimes referred to as “the thin place” where the boundary between the physical and spiritual worlds is felt to be very close. Pilgrims take in the Islands setting, the boat across from Mull, Iona’s hills and beaches, the machair covered in flowers. For many these things combine into a profound, quiet tranquility for mindfulness and reflection. There is a sense of time too. Iona history. The birthplace of Scottish Christianity in Scotland in 563AD when Columba and his 12 decibels chose this specific special place to set up their monastic

settlement. A pristine place so special that 48 Scottish Kings were buried on the Isle together with 8 Norwegian kings and 4 Irish kings. Iona's monastery was a major hub for medieval scholarship and manuscript production - likely including world-famous illuminated gospel manuscript, the Book of Kells. Must this thin place become thick with turbines because a Spanish energy company believes an array of 1000 foot tall turbines across Iona's horizon is possible? There are other locations beyond this horizon. The company already has plans to build there - this is their easy, most profitable option. Let them head beyond the horizon and leave Iona unscathed, magical.

While a Spanish windfarm developer may think it reasonable and profitable, it is totally unreasonable for most residents, tourists and pilgrims to have the background of Iona transformed into an absolutely huge array of rotating, flickering, industrial turbines. Iona is too precious and other sites beyond the horizon exist.

<u>Regarding MachairWinds negative impact on the Scottish consumers electricity costs.</u>

we are repeatedly told that offshore wind farms will power millions of homes and help Scotland achieve its net-zero targets. This narrative is deeply misleading.
If data centre expansion doubles Scotland's electricity consumption, the nation will have to build twice as many wind farms just to maintain its current proportion of renewable energy. In reality, these projects are being built in Scotland primarily to exploit the UK's Contracts for Difference (CfD) subsidy framework—a system that effectively inflates electricity bills for all consumers across Great Britain.
The CfD mechanism guarantees developers a fixed "strike price." In the latest UK Government Allocation Round 7 (AR7) auctions, successful offshore wind projects secured a guaranteed strike price averaging £91 per megawatt-hour (MWh). If the market price of electricity falls below this threshold, consumers subsidise the difference through their energy bills. Consequently, new wind farms will actually lock in high energy costs. When vast amounts of wind power flood the grid simultaneously, the market price can drop to zero or even turn negative. During these periods, the subsidy gap widens. With every new wind farm added to the grid, this financial burden increases, and consumers are forced to

absorb the cost.
Furthermore, expanding generation requires massive transmission upgrades. Without them, the grid cannot physically transport excess electricity from Scotland to high-demand areas in the south. When the grid bottlenecks, the system operator pays wind farms to shut down. These expensive "constraint payments" are then recovered directly through consumer electricity bills. In 2025, total grid balancing and constraint costs hit a record-breaking £1 billion in Scotland, with nearly £343 million paid directly to wind farms just to turn off their turbines. Some sites, like the massive Seagreen wind farm off the Angus coast, were paid to remain completely idle for up to 63% of the year. Worse still, even when Scotland runs on 100% wind energy, the wholesale electricity price remains pegged to national gas prices, keeping Scottish bills artificially high.
Ultimately, Scotland already generates more renewable electricity than it consumes annually. It is therefore disingenuous to claim that building more wind farms benefits Scottish consumers. If achieving net zero is the true aim, we should halt data centre expansion rather than over-building infrastructure. For Scottish consumers, this is a zero-benefit game: heads the energy companies win, tails the consumer loses.

Regards, **[Redacted]**

Member of the Public 4925

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	OBJECTION TO MACHAIRWIND OFFSHORE WIND FARM
Date:	11 August 2026 09:05:22

To Marine Directorate

I wish to formally object to the proposed MachairWind Offshore Wind Farm.

I want to begin by making clear that I am not opposed to renewable energy or offshore wind in principle. I recognise the need for Scotland to generate more renewable electricity.

My objection is to this development, at this scale and in this location, and to what I consider to be fundamental weaknesses in the way some of its impacts on the Ross of Mull and Iona have been assessed.

Having spent considerable time reading the Environmental Impact Assessment, particularly Chapters 16 and 18, and corresponding with the developer through Mull Community Council, I have become increasingly concerned that the assessment does not adequately capture what is actually at risk.

At the centre of my concern is a relatively simple issue:

The environmental effects are concentrated on the Ross of Mull and Iona, yet the socio-economic assessment repeatedly broadens the assessment to the whole of Mull.

That matters enormously.

1. The Ross of Mull is the affected area – not the whole Isle of Mull

Chapter 18 itself states that:

> "Significant landscape and visual effects have been identified on receptors in southwest Mull at distances of 21–24 km."

It acknowledges that these effects may affect beaches and outdoor spaces in southwest Mull. However, it then reasons that other parts of the island, including the east, north and "areas with a greater level of tourism infrastructure, such as Tobermory" will not be affected. Because the "majority of features" remain unaffected, the tourism impact is assessed as low.

I consider this a serious weakness in the methodology.

The affected community is the **Ross of Mull**. Yet the impact upon that area is effectively diluted by including parts of Mull which will experience little or none of the identified effect.

Tobermory is not the Ross of Mull. Duart Castle is not the Ross of Mull.

The fact that a visitor can continue to visit an unaffected attraction elsewhere on a large island does not reduce the alteration being experienced by the community and visitor economy in the southwest.

If an environmental impact is geographically concentrated, surely the socio-economic assessment should examine the economy and community of the **area experiencing that impact**.

I therefore ask the Marine Directorate to consider whether “Mull” is an appropriate geographical receptor for the tourism assessment at all, when Chapter 18 itself identifies the significant visual effects specifically in southwest Mull.

This is particularly important because the Ross of Mull is not simply an arbitrary geographical corner of a larger tourism destination. It is a destination in its own right and the gateway to Iona and Staffa.

Fionnphort, Erraid, the Sound of Iona, the Iona ferry crossing, west-facing beaches, coastal walks and the journeys to Iona and Staffa are fundamental parts of the visitor experience.

Indeed, Chapter 16 selects **Erraid, the Mull–Iona ferry and Dun I on Iona as specific assessment viewpoints**.

I therefore question whether unaffected attractions elsewhere on Mull should have any material role in reducing the assessed magnitude of a tourism impact concentrated on the Ross of Mull.

2. The assessment confuses the continued existence of an attraction with the continued quality of the experience

There is a further problem with the reasoning in Chapter 18.

It identifies individual tourism features—wildlife, heritage, beaches, Tobermory and so on—and asks which of them will continue to exist.

But that is not necessarily how visitors experience a place.

A white-tailed eagle does not cease to exist because turbines appear behind it.

Staffa does not disappear.

Iona Abbey remains standing.

A beach remains a beach.

But that does not mean the **experience of visiting those places remains**

unchanged.

Someone travelling across the Sound of Iona is not simply consuming a ferry service. Someone watching wildlife is not simply consuming a wildlife species. Someone sitting on an Atlantic-facing beach is not simply consuming sand.

They are experiencing the landscape, seascape, weather, wildlife, history, tranquillity and remoteness together.

The EIA itself describes the view from the Mull–Iona ferry as having **uninterrupted views across the Sound of Iona**, with longer-distance views looking **"out across the Atlantic"** towards the development.

That is exactly what I fear the socio-economic methodology fails to capture.

3. Sense of place cannot adequately be reduced to a matrix

There is something deeply human about looking towards an open horizon.

For generations, the landscapes and seascapes of the Highlands and Islands have been written about, painted, photographed and sung about. That is not accidental.

An open seascape invites the eye to travel.

People stand on these shores and look for Staffa, Tiree, Coll, Colonsay or distant hills. They watch boats appear and disappear over the horizon. They watch weather coming in from the Atlantic. They look for whales, dolphins and seabirds. They watch sunsets. At night, the same horizon disappears into darkness and the sky takes over.

Part of the experience is precisely **what is not there**.

That absence of development has value.

The open horizon, darkness, remoteness and uncertainty about what might appear in the distance form part of the sense of place.

The proposed turbines are not simply isolated "objects at a distance". Up to 144 turbines would create a large industrial array occupying sections of that horizon.

Chapter 16 itself describes the 144-turbine layout from various viewpoints as turbines spread across the skyline and recognises significant effects from locations including Erraid and Dun I. At Dun I, for example, the assessment concludes that the operational visual effect would be **moderate and significant**.

I therefore find it difficult to reconcile the acknowledgement of significant landscape and visual change with the conclusion in Chapter 18 that the

consequences for tourism are minor simply because other tourism features remain available.

4. John Urry and the “Tourist Gaze”

There is an established body of tourism scholarship which helps explain why this distinction matters.

John Urry's concept of the **“tourist gaze”** recognises that tourists seek places and visual experiences which are different from those encountered in ordinary everyday life.

This seems particularly relevant to the Highlands and Islands.

Visitors do not travel to Mull and Iona simply to tick individual attractions off a list.

They come partly because the place feels different.

The journey matters. The landscape between destinations matters. The absence of urbanisation matters. The views matter. Remoteness matters.

In that context, the landscape is not merely the setting in which the tourism economy operates.

The landscape is part of the tourism product.

That distinction should be central to an assessment of a development whose primary local effect is landscape and visual change.

5. Engagement is not evidence

SPR has responded to questions raised through Mull Community Council by emphasising its extensive engagement with local communities and organisations.

I acknowledge that engagement.

The developer has held drop-in sessions, attended community council meetings and events and engaged with organisations including MCC, Iona Community Council, SWMID and MICT.

But **community engagement and primary evidence are not interchangeable**.

Holding an exhibition tells people about a development and allows them to express views.

It does not in itself establish:

-

why people visit the Ross of Mull;

- how they value its landscape;
- how important uninterrupted seascapes are to visitor experience;
- the economic importance of the affected areas;
- how local tourism businesses depend upon those characteristics;
- whether visitors would change where they stay, how long they stay or whether they return;
- or how residents value the landscape in which they live.

SPR's response states that the local baseline was developed using ferry passenger numbers and tourism features, after which empirical evidence from **other UK coastal areas with existing offshore wind farms** was applied to that baseline.

That is not the same as gathering empirical evidence from the receiving community.

6. The comparator evidence needs much greater scrutiny

Chapter 18 relies heavily on evidence from other offshore wind developments to support its conclusion that MachairWind is unlikely to have a significant effect on tourism.

For example, the assessment refers to research examining tourism and visitor responses around existing offshore wind farms and concludes that there is generally no evidence of adverse effects on tourism employment or visitor behaviour.

I accept that evidence from operational wind farms is relevant. However, before applying those findings to the Ross of Mull and Iona, there needs to be much greater scrutiny of whether the developments being relied upon are genuinely comparable.

The research cited includes visitor studies associated with offshore wind farms around **Aberdeen, Brighton, Great Yarmouth and North Wales**. Many of these

developments involve turbines dramatically smaller than those proposed for MachairWind.

For example, Rampion's turbines are approximately **140 metres to blade tip and 3.45 MW**, while Scroby Sands uses **2 MW turbines**. By contrast, MachairWind's design envelope allows for **up to 144 turbines approximately 280 metres to blade tip**, or a smaller number of turbines reaching approximately **335 metres**.

Distance from shore also varies considerably between comparator projects. This is important because neither turbine height nor distance can sensibly be considered in isolation.

A 100–140 metre turbine viewed from one distance cannot simply be assumed to provide evidence about people's response to a 280–335 metre turbine at another distance.

Nor is the height of an individual turbine the only consideration. The visual experience of an offshore wind farm is affected by:

- turbine height and rotor diameter;
- number and density of turbines;
- distance from the receptor;
- horizontal extent of the array across the horizon;
- atmospheric conditions;
- aviation and navigation lighting;
- and, critically, the character of the landscape from which it is being viewed.

Chapter 16 itself recognises that the 144-turbine scenario creates greater turbine density across the horizon, even where individual turbines may appear somewhat smaller than under the alternative layout.

This distinction is particularly important in the Ross of Mull and Iona because the receiving environment is an open Atlantic seascape characterised by comparatively little development.

There is also a fundamental difference between asking whether an offshore wind farm affected tourism in Aberdeen, Brighton or Great Yarmouth and asking whether an industrial development of this scale could influence visitor experience in the Ross of Mull and Iona.

The relevant question is therefore not simply:

"Have previous offshore wind farms caused measurable reductions in tourism?"

It is:

"Is there reliable evidence from developments sufficiently comparable in turbine scale, array scale, distance, lighting, landscape character and tourism dependency to allow their outcomes to be transferred to the Ross of Mull and Iona?"

I do not believe Chapter 18 adequately demonstrates that comparability.

I therefore ask the Marine Directorate to require the applicant to demonstrate the relevance of the comparator developments relied upon, including their **turbine height, rotor diameter, number of turbines, horizontal extent, distance from relevant receptors, aviation-lighting regime and the characteristics of the receiving tourism economy**.

Without that comparison, there is a danger of treating all offshore wind farms as equivalent when they plainly are not.

7. Aviation lighting and the loss of darkness

My greatest individual concern is aviation lighting.

Chapter 16 explicitly acknowledges that aviation and marine lighting can cause potentially significant effects where there are few existing artificial lights and where **“darkness or dark skies are an integral and valued aspect”** of the landscape or seascape.

That description could scarcely be more relevant to the Ross of Mull and Iona.

At Erraid, the EIA states that red flashing aviation lights and yellow flashing marine navigation lights would be visible approximately 21 km away in an **“otherwise dark seascape.”**

Under the 2,000 candela scenario, the EIA itself assesses the night-time effect at Erraid as **moderate and significant**. It only falls to minor/not significant under the assumed 200 candela scenario.

At Dun I on Iona, the same distinction occurs: the 2,000 candela scenario produces a **moderate and significant** night-time effect, whereas the assumed 200 candela scenario is assessed as minor.

That difference is extremely important.

The conclusion therefore depends heavily upon the eventual lighting specification and operating regime.

Yet the final detailed Lighting and Marking Plan has not been agreed.

I do not believe a visualisation based upon an assumed lighting arrangement can provide sufficient certainty about the final effect if the lighting scheme that will actually be constructed remains subject to later agreement.

This should not be treated as a minor technical detail to be resolved after consent.

Darkness is part of the existing environmental baseline.

Once regular flashing aviation lights are introduced across an Atlantic horizon, that baseline has fundamentally changed.

8. Construction is not simply “temporary” to the people living through it

I am also concerned about the treatment of construction effects.

Chapter 16 describes construction effects as short-term and reversible, involving marine traffic, construction activity and the progressive appearance of partly constructed turbines and platforms.

In EIA terminology, that may be described as temporary.

For a resident or tourism business, however, several years is not insignificant.

It is several tourist seasons.

It is several summers.

It is a period of children's lives and people's working lives.

The Marine Directorate should consider construction effects from the perspective of the communities actually living through them, including vessel activity, construction lighting, changing views, disturbance and the cumulative experience as an industrial development of this scale gradually occupies the horizon.

9. The economic value of the landscape must form part of the balance

I also believe there is a danger in presenting renewable-energy development as an economic benefit while treating the landscape affected by that development primarily as an aesthetic or environmental consideration.

The landscape of Scotland is itself an economic asset.

Tourism is one of Scotland's major industries. VisitScotland reports that the visitor economy generates approximately **£10.8 billion in visitor spending and supports around 245,000 jobs**. The Highlands alone recorded approximately **1.79 million overnight tourism visits in 2024, generating around £756 million in visitor spending**.

Perhaps even more relevant to this assessment is *why* people choose Scotland.

VisitScotland's Scotland Visitor Survey found that approximately **70% of visitors cited scenery and landscape as a reason for choosing Scotland**.

That is important evidence.

The landscapes and seascapes of the Highlands and Islands are therefore not simply beautiful places which must occasionally be sacrificed in pursuit of economic development. **They are productive national economic assets in their own right.**

That should fundamentally affect the way the competing benefits are considered.

Chapter 18 also identifies where many of the direct economic benefits associated with the project are expected to occur. Major beneficial effects are associated with marshalling, assembly, operations and maintenance locations including Hunterston, Oban, Kishorn, Campbeltown and Machrihanish, as well as wider Scottish supply-chain benefits.

The geographical distribution is therefore important.

The **Ross of Mull and Iona experience significant landscape and visual effects**, while substantial employment and investment benefits identified by the EIA are expected elsewhere.

At present, there is also no clearly defined long-term community benefit package for the Ross of Mull and Iona proportionate to the scale and duration of the impacts being accepted.

Nor does generating approximately 2 GW of renewable electricity mean that households in the Ross of Mull will receive cheaper electricity.

That distinction matters to me.

I believe most people understand that achieving net zero will require

compromises. I also believe many communities would be prepared to accept some loss or change to landscapes they value if they could see a clear and compelling wider public benefit — particularly if that transition delivered things such as greater energy security, lower household energy costs and tangible benefits for the communities bearing the environmental impacts.

But that social bargain cannot simply be assumed.

This is a commercial energy development. The electricity enters the national transmission system, while the economic benefits and environmental impacts are distributed very differently geographically.

The Marine Directorate should therefore consider not only the **gross economic benefit generated by the project**, but the distribution of that benefit alongside the distribution of its environmental and socio-economic costs.

The question is not whether renewable energy has economic value. Clearly it does.

The question is whether sufficient weight has also been given to the economic value of the landscape being changed and to the communities whose relationship with that landscape will be altered for decades.

For these reasons, I object to the MachairWind Offshore Wind Farm in its current form and ask that these matters are given substantive consideration before any consent is granted.

[Redacted]

--



Member of the Public 4926

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Machair Wind Offshore Windfarm
Date: 15 August 2026 19:07:23

Dear Sirs

I wish to raise my objection to the proposed MachairWind Offshore Windfarm. I am a resident and house owner on Mull and I feel that this proposed wind farm will be very detrimental to the area.

The proposal is simply too big and will have an enormous impact on the area in many ways that have no positive benefits to Mull. The turbines are huge and the continuous flashing red lights will be terrible for human residents and wildlife. The construction of these monster turbines will cause huge destruction of the seabed and the bird pathways will be destroyed. All these wonderful natural habitats are essential to tourism on the islands. In fact tourism is the lifeblood of the Hebrides and our fragile environment will be utterly destroyed for what? Scotland is already a net exporter of electricity so we do not need an enormous wind farm wrecking our environment when there is insufficient grid infrastructure to distribute all this energy to where it is needed. The impact of the grid infrastructure is horrendous too and will destroy beautiful inland countryside.

This proposal is not made for the residents of the area it destroys and impacts. This proposal is made for the profits of the Spanish developer Scottish Power Renewables.

Yours is ncerely

[Redacted]

Member of the Public 4927

From: c [Redacted]
To: MD Marine Renewables
Subject: Objection to Machair Wind Farm Development
Date: 14 August 2026 16:15:06

To Whom It May Concern

The Western Isles in Scotland are truly exceptional, unique. There is nowhere else in Britain, in Europe, or possibly even the world, that is quite like them. They are outstanding in their natural beauty and draw visitors from all over the world. In this last week alone, I have seen cars and met visitors from France, Germany, The Netherlands, Austria, Switzerland, Spain, Italy, Belgium, Canada, The United States and Australia. They have not come to visit the shops, the theatres, the architecture or the amusement parks. They have come either to enjoy the unspoilt beauty of nature, landscapes and seascapes, or for the chance to see some of its abundant wildlife, both on land and sea. The visit is a source of great joy for so many, as they experience the tranquility and visual beauty and the thrill of seeing wildlife which has found the space and security to live in or visit the area. Obviously with so many visitors, the islanders have come to rely on this tourist industry as their main source of income.

My own home is not too far from Bournemouth. Like most people, I do not particularly enjoy having to look out from Bournemouth and seeing Wind Turbines. However, looking out to sea is never my primary reason for visiting Bournemouth and with so much urban construction all around, the loss of scenic beauty does not have too much impact on me there. Some coastal areas are used for recreation, where the beaches are the reason for people visiting. Other coastal areas are used for their entertainments with theatres, ballrooms, lights and piers. None of these rely on the visual impact of the sea.

The situation in the Western Isles is different. It is totally reliant on its natural features to attract visitors. Looking out to sea in the Hebrides is a joy in itself. Depending on the angle of view, the islands form different patterns, distinguishable by their unique silhouettes and shapes, by their colours dependent on the hills, the sun and the rain. No two days are alike.

It is also an area abundant in wild life of all forms which thrive here, in particular its marine mammals and its bird colonies. In these days when we deplore the loss of natural habitat throughout the world, it is good to think that such a rich variety of endangered species come to find safety in our waters. As I write, there is a hump back whale which is cruising around the island of Coll, as well as the more common minke whales, basking sharks and dolphins of various species, although even these are sadly becoming less common as a result of contact with humanity. Bird colonies still thrive also without the danger of man and his hardware.

It seems to me that the whole area should be designated as an Area of Outstanding Beauty or a Maritime National Park with all the protection and safeguarding from development

that the status gives. It is at least as important, if not more so, than the Lake District and other National parks on the UK mainland. Please consider this suggestion.

In the meantime, I am not going to enter into the doubtful legalities of the proposed development, nor the inevitable damage it would cause to the sea bed , the marine wildlife and the birds massacred by the turbines, nor the livelihood and quality of life of the islanders, nor even the questions raised regarding wind turbines lying idle elsewhere, nor the lack of development for storage of generated electricity. Anyone who really cares for Nature, for Wildlife or indeed for Scotland itself and its beautiful heritage would be ashamed to back a development of this scale at this place. I can only say that I wish to object in the strongest possible way to a proposal which I believe would be an irreversible, unforgivable and unnecessary atrocity.

[Redacted]

Member of the Public 4928

From: [Redacted]
To: MD Marine Renewables
Subject: Machair Wind - Objection
Date: 29 June 2026 11:11:08

To whom it may concern.

I am writing to formally submit my objection to the proposed MachairWind offshore wind farm development by ScottishPower Renewables.
My objection is based on the significant and unacceptable impact this industrial-scale project would have on our region. As a resident of Scarinish Tiree, I am deeply concerned about the long-term
consequences of this proposal:
Visual and Landscape Impact: The scale of the proposal—involving up to 91 turbines standing 340 metres high—is industrialisation on an unprecedented scale. These structures will dominate the horizon, irreversibly damaging the character, tranquillity, and natural beauty of our coastlines, which are vital to our local community and tourism-based economy.

Environmental and Ecological Harm: The construction and operation of such a massive facility pose significant threats to marine ecosystems, including migratory pathways for birds and fish, as well as the habitats of marine mammals. The industrialisation of the seabed is not compatible with the protection of our fragile marine environment.

Dark Sky Degradation: The requirement for aviation and maritime safety lighting on these turbines will cause severe light pollution, destroying the dark-sky environment that is a precious and cherished asset of our islands.

Lack of Local Benefit and Justification: It is my understanding that Scotland already generates a significant amount of renewable energy and that there are serious concerns regarding current grid limitations. I am not convinced that this project will provide genuine, tangible benefits to our local communities, while the risks to our environment and local way of life are clear and immediate.

Given the scale of the potential negative impact on the environment, the local economy, and the heritage of our islands, I urge you to refuse consent for the MachairWind development.

I look forward to confirmation that my objection has been received and considered as part of the formal consultation process.

Yours faithfully,
[Redacted]

Member of the Public 4929

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Fwd: Machair windfarm
Date: 03 August 2026 11:24:09

Dear Sir
I am registering my objection to the Machair Wind Farm proposed by Scottish Power Renewables. My reasoning is set out in the attached letter to the Daily Telegraph. The size of this development and its proximity to so many of the finest seascapes on the West Coast is wholly unacceptable.
Yours sincerely
[Redacted]

[Redacted]

Sent from my iPhone

Begin forwarded message:

From: [Redacted]
Date: 1 August 2026 at 16:22:22 BST
To: d [Redacted]
Subject: Machair windfarm

Sir
The Scottish Government is on the brink of an act of unimaginable cultural, social, economic, and environmental desecration. The proposed Machair Windfarm off the coast of Colonsay will, if approved, cover an Area 51 times the size of Iona and include up to 91 turbines over 300 metres high - the highest structures in the UK. The Community Council of Colonsay has written an excellent letter of objection, couched in remarkably restrained language given the appalling impact this development will have on them, and about which they were not properly consulted, even though they are only 6 miles away.
The impact on the marine habitat and on the seabed in this wild and precious region cannot be overstated. It is an area freighted with cultural significance being the sea that Columba crossed to settle on Iona: an area of dark sky, great beauty, and pristine sea. The westering sun, seen from the coasts of Mull, Colonsay, Islay, and Iona, is one of our greatest treasures - now to be destroyed by huge windmills with winking lights day and night.
It is the most extreme example of how big business, able to afford all the lawyers and consultants money can buy, is able to override local interests who cannot possibly match their economic power. The bitter irony of course is that the grid cannot handle all this extra generation and the developers will walk away with millions in compensation for the power that cannot be used.
This is not a case of ‘climate change denial’, but it is a desperate plea for balance in a world going mad with the pursuit of net zero.
[Redacted]

Sent from my iPhone

Member of the Public 4930

From: Colin macdonald
Marine Renewables
Subject: MachairWindfarm.
Date: 22 July 2026 17:11:32

I wish to object in the strongest terms to this development. I agree with the cogent arguments put forward by ICC.
I would only add that when local and sensible planning rules applied here residents building houses had to adhere to strict roof to wall ratios, wooden windows with astragals and houses had to be white. All to protect the characteristics in this area of Outstanding Natural Beauty which would be destroyed by this industrial scale development .

[Redacted]

Member of the Public 4931

From: [Redacted]
To: MD Marine Renewables
Subject: https://marine.gov.scot/?q=node/23854
Date: 21 July 2026 23:04:28

Dear Sir or Madam
Iona-Mull sea based wind turbine application/s

Aside from the environmental impact to this area for marine conservation, fishing and the tourist economy it is
- a physical and economic nonsense to build electricity generation so far distant from the major points of consumption. The losses in the transport of electricity and difficulties in storage speak for themselves
- a low local population to raise objections , petitions etc does not justify this type of planning application and the powers that be are in a position to take sensible action on behalf of the country's future.
-the country cannot promote tourism internationally as an economic mainstay for out- lying areas and ruin the very landscape upon which those long-term economics depend
- payments are already made to existing wind farms for overcapacity on the grid
- payments are made to conventional generators linked to wind and solar non production as weather closes their provision
- 'local payments' and incentives are offered alongside the excellent sale pitch from big companies such as Machair Wind. These understandably sway the unwary or insufficiency informed. The actual sums offered reflect neither the money being made by the company nor the long term damage.

I ask that this type of application be refused and development be made close to the area of electricity demand to better serve the environmental and green agendas.

[Redacted]

Sent from my iPhone

Member of the Public 4932

From:	**[Reda**
To:	MD Marine Renewables
Subject:	Iona wind farm
Date:	21 July 2026 09:45:39

To whom it may concern .
The purpose of this email is to express total objection to the proposed plan of installing 91 wind turbines just off the coast of Iona .
This is insanity and would result in the destruction of a spiritually significant location with empty horizons looking to Ireland from where St Columba sailed to bring Christianity to this island and beyond. In addition it would create havoc to the wonderful sea mammals and rare and migratory birds that frequent this area.
This is not environmentally friendly , destroys the birthplace of Christianity in Scotland and as such should not be considered .

Sent from my iPhone
[Redacted]

Member of the Public 4933

From: [Redacted]

Sent: 19 August 2026 19:08

To: [Redacted]

Subject: Machair Wind

Sent from my Galaxy

Dear [Redacted]

I am writing to you as Climate Change Minister re the above to voice my strong concerns. I know from the Berwick Bank project that ,once planning consent has been given, ameliorations or mitigations never compensate at all for what is lost.

I cannot understand the SNP' s rush to green energy at the expense of our beautiful environment. In the current circumstances we will have no tourism in wildlife areas or seabirds left!

I am or at least used to be an SNP activist.

Unfortunately I missed the formal objection date of the above. I was on Mull in June and saw no publicity about this which there should have been.

I am a longterm visitor to Mull, Colonsay, Jura and Islay.

I am appalled to learn that this beautiful landscape could be ruined by 91 Eiffel tower size wind turbines which will do irreparanle damage to the landscape, seascape, local businesses and seabirds, including the puffins on the Treshnish islands. It is not an exaggeration to say it is an iconic landscape worthy of UNESCO status.

There is currently £1.4 billion being paid to the energy companies in Scotland NOT to produce energy, not because it is not needed but due to the failing national grid which is where infrastructure money should be spent.

I am writing to request you urgently express your opposition to this ill conceived project. I do not know your views and they need to be known. The Berwick Bank project on the east coast near me has already been given the go ahead subject to mitigatory factors which will be hard to determine their efficacy. Please do let this happen again in an even more outstanding area of natural beauty.
Of course there is a tension between not zero and green energy. No one wants high turbines as the view and killing wildlife but this is a particularly lovely area which cannot be spoiled by Iderbola in the name of unrequired green energy. The

islanders will not benefit in any way even from cheaper electricity.

Yours sincerely
[Redacted]

Sent from my Galaxy

****

The Scottish Parliament: Making a positive difference to the lives of the people of Scotland
Pàrlamaid na h-Alba: A’ toirt deagh bhuaidh air beatha sluagh na h-Alba

www.parliament.scot : facebook.com/scottishparliament : twitter.com/scotparl

The information in this email may be confidential. If you think you have received this email in error please delete it and do not share its contents.

****

Member of the Public 4934

From: **[Redacted]**
To: MD Marine Renewables
Subject: Iona wind farm
Date: 06 August 2026 08:58:22

Dear Sir/Madam

I am writing in support of the objection raised by Iona Community Council against the MachairWind wind farm proposal.
The importance of Iona in terms of history, culture, ecology and beauty to Scotland and indeed to Europe is immense. All the islands in this area are vulnerable and depend highly on tourism. The proposed position of this wind farm would have an important detrimental effect on the islands and on the people who live there.
The risk assessment carried out does not seem to have properly taken this into account.
Please reconsider your proposals.

Yours sincerely
[Redacted]

Member of the Public 4935

Formal Objection to the Proposed MachairWind Offshore Wind Farm

To: Scottish Ministers

Formal Objection to ScottishPower Renewables' MachairWind Offshore Wind Farm Proposal

I am writing to formally object to ScottishPower Renewables' proposed MachairWind offshore wind farm development.

I am a former member (2021 – 2025) of the Scottish Government's National Strategy for Economic Transformation Delivery Board (NSET) chaired by the then DFM Kate Forbes during which time I was a passionate supporter of the transition to Green energy and I remain so today. I fundamentally believe we cannot survive as a planet without this transition and that Scotland still has the opportunity to be a world leader in making this transition a reality.

Having reviewed the concerns raised by the Community Councils of Colonsay, Islay, Iona and Tiree, I believe there are substantial environmental, legal, cultural and socio-economic grounds for refusing consent for this proposal in its current form. The objections submitted by these island communities identify serious concerns regarding the suitability of the site, landscape and seascape impacts, harm to cultural heritage, effects on marine ecology, disruption to fisheries, navigation and lifeline services, shortcomings in the Environmental Impact Assessment, and the overall adequacy of the information presented to decision-makers.

A fundamental concern is whether the proposed development is located in an appropriate area. The waters surrounding Colonsay, Islay, Iona and Tiree form part of a nationally and internationally important landscape and seascape. These islands are recognised for their exceptional natural beauty, cultural significance, biodiversity and visitor appeal. The proposed wind farm would introduce a major industrial development into a sensitive marine environment that contributes significantly to the identity and character of these island communities.

The visual impact of the development is one of the most significant concerns. The proposed turbines would fundamentally alter views from many parts of the islands and would industrialise seascapes that are currently valued for their openness, tranquillity

and remoteness. The communities objections identify substantial landscape and visual effects that would permanently alter the character of the region.

The proposal also threatens the setting of important historic and cultural assets. The objections specifically identify potential adverse impacts on the setting of Oronsay Priory, Iona Abbey and other heritage assets whose significance is inseparable from their surrounding landscapes and seascapes. These sites are internationally recognised cultural landmarks and their value derives not only from their physical structures but also from their relationship with the wider environment.

The socio-economic consequences of the proposal have also not been adequately addressed. Tourism remains a vital component of the local economy across the affected islands and as a significant contributor to the Scottish economy as a whole. Visitors are drawn by the unspoilt scenery, wildlife, cultural heritage, dark skies and sense of remoteness that characterise the Hebrides. There is a legitimate concern that the industrialisation of the seascape could undermine these attractions and damage the visitor economy. There are serious and as yet unanswered questions as to whether any meaningful local benefit would arise from the development that would justify the scale of the environmental and social impacts.

Marine ecology and biodiversity is another major area of concern. The waters surrounding the islands support important habitats and species, including protected seabirds and marine wildlife. Particular concerns have been raised regarding impacts on protected areas and biodiversity interests that are critical to the ecological health of the region. The very poor environmental impact assessment, which seems largely based on assertion rather than evidence does not answer these concerns

There are also significant concerns regarding fisheries and fishing displacement. Fishing remains an important economic activity and cultural tradition throughout the region. Exclusion zones and changes to established fishing grounds could have lasting impacts on local livelihoods and coastal communities.

The proposal also raises significant questions regarding navigation safety and lifeline connectivity. Safe and reliable maritime transport is essential for island communities. Ferry services, commercial vessels and fishing fleets rely on navigable waters to sustain community life and economic activity. Any risks to navigation or access to essential transport routes must be given significant weight.

In addition to these substantive concerns, there are serious questions regarding compliance with Scotland's environmental legislation and regulatory framework.

Under the Marine (Scotland) Act 2010, Scottish Ministers have statutory duties relating to sustainable development and the protection and enhancement of Scotland's marine environment. The proposal must also satisfy environmental assessment and marine consenting requirements designed to ensure that development does not proceed at the expense of biodiversity, heritage or marine ecosystem health. It does not meet either test.

The needs for associated infrastructure is not properly or fully assessed as part of the project under consideration. Decision-makers should not be asked to evaluate a development in isolation if its wider supporting infrastructure may generate additional environmental impacts.

The adequacy of the Environmental Impact Assessment is strongly disputed by the affected community councils and I share that view. Environmental assessment legislation exists to ensure that decision-makers have sufficient information to reach informed conclusions regarding environmental consequences. If significant uncertainties, omissions or methodological shortcomings remain, consent should not be granted until those deficiencies are addressed.

Particular attention must be given to the requirements of the Habitats Regulations, which require careful assessment of impacts on Special Protection Areas, Special Areas of Conservation and other protected sites. Given the concerns raised regarding protected species, biodiversity, marine ecology and designated conservation sites, Scottish Ministers must be fully satisfied that the project would not adversely affect the integrity of protected sites. Where scientific uncertainty remains regarding environmental impacts, the precautionary approach should apply.

The ecological sensitivity of the waters surrounding these islands requires a particularly robust and transparent assessment process. The proposal must be considered in light of legal duties to protect marine habitats and species and to ensure that environmental risks are properly identified, assessed and mitigated before any consent is granted.

While I recognise and support Scotland's commitment to renewable energy generation and climate change objectives, these ambitions must not override the legal obligations to protect biodiversity, cultural heritage, marine ecosystems and the wellbeing of island communities. Renewable energy development should be pursued in locations where environmental, social and cultural impacts can be minimised.

For all of these reasons, I strongly urge Scottish Ministers to refuse consent for the proposed MachairWind development. The objections submitted by Colonsay, Islay, Iona and Tiree Community Councils raise substantial and credible concerns that have not

been satisfactorily addressed. The proposal risks causing significant and lasting harm to internationally important landscapes, marine ecosystems, protected habitats, cultural heritage assets and island communities. Until these concerns are fully resolved, consent should not be granted.

Yours faithfully,

[Redacted]

Member; Scottish Government's National Strategy for Economic Transformation Delivery Board member 2021 – 2025

[Redacted]

Member of the Public 4936

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Machair Wind farm
Date:	15 August 2026 22:48:28

Objection to the proposed MachairWind Offshore Wind Farm, Section 36 application reference 00012385 and marine licence application reference 00012386, associated case reference ECU00004704, submitted by MachairWind Limited (ScottishPower Renewables)

I am writing to formally object to the above application for consent under section 36 of the Electricity Act 1989 and for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection is formally recorded and that I am notified of the outcome of both applications.

I object to the applicant's visualisation of the proposed Machair Wind Farm and its visual impacts. The applicant has not provided realistic visual assessments. The assessment itself rests on static photomontages and does not provide an accurate representation of reality: from many angles, particularly from the south and west, the turbines will appear as dark silhouettes rather than distant white structures.

Additionally, the continuous red flashing aviation hazard lights and white shipping hazard lights, potentially visible from up to 30 miles away, will dramatically change the character of the coastline and the dark skies that are so valued in this region. The official visualisations do not accurately reflect this impact, meaning Scottish Ministers will not be able to make a properly informed decision about the true visual consequences of the development.

There has also been no adequate assessment of whether a Demand-Controlled Night Marking (ADNL) system should be adopted, as is required in many European countries. Such a system would vastly reduce unnecessary light pollution and visual intrusion and should be properly considered before any decision is made.

Yours sincerely,
[Reda
cted]

Sent from Outlook for iOS

Member of the Public 4937

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Representation Objecting to the MachairWind Offshore Wind Farm Application
Date:	29 July 2026 20:22:25

Dear Sir/Madam,

I am writing to object to the proposed MachairWind Offshore Wind Farm application.

I am a permanent resident of the Isle of Tiree. My home is situated on the south-east coast of the island, and the proposed wind farm would be visible from my property and from many locations that I use regularly. My objection is based on the significant and lasting impacts that this development would have on the landscape, seascape, natural environment and the communities that depend upon them.

My principal concerns are as follows:

1. Significant visual and seascape impact

The waters surrounding Tiree, Mull, Iona and the wider Inner Hebrides are recognised for their exceptional natural beauty and sense of openness. The introduction of a very large offshore wind farm would fundamentally alter the character of these seascapes.

The uninterrupted views across the Atlantic are one of the defining features of Tiree. The proposed development would industrialise what is currently a largely natural horizon, reducing the sense of remoteness and tranquillity that residents and visitors alike value.

As someone who would see the development from my own home, this represents a substantial and permanent change to the environment in which I live.

2. Impact on landscape character and scenic value

The landscapes and coastlines of the Hebrides are internationally recognised for their outstanding scenic qualities. The cumulative effect of hundreds of turbines, aviation lighting and associated offshore infrastructure would diminish the unique landscape character that attracts visitors from around the world.

Once this character is lost, it cannot realistically be restored.

3. Impact on tourism

Tourism is one of the principal economic drivers for Tiree and neighbouring islands. Many visitors come specifically for the unspoilt scenery, wide horizons, dark skies, wildlife and feeling of escape from industrial development.

There is a genuine risk that the industrialisation of the surrounding seascape could damage Tiree's reputation as a destination for nature-based and landscape tourism, with consequential effects on local businesses, accommodation providers, restaurants, outdoor activity providers and the wider island economy.

4. Wildlife and marine environment

The waters surrounding Tiree support internationally important populations of seabirds, marine mammals and other protected species. I remain concerned about the potential effects of the construction and operation of such a large development, including underwater noise, habitat disturbance, increased vessel movements and collision risks for birds.

Given the ecological importance of this area, I believe the precautionary principle should be applied where there remains uncertainty over long-term impacts.

5. Cumulative impacts

This proposal should not be considered in isolation. Scotland's west coast is facing multiple offshore renewable developments, and their combined effects on landscapes, wildlife, navigation and coastal communities could be substantially greater than the impact of any one project alone.

I am concerned that cumulative impacts have not been given sufficient weight.

6. Effects on local communities

Island communities such as Tiree rely heavily upon their natural environment for their quality of life, wellbeing and economic sustainability. Residents who experience the visual impacts every day will bear the long-term consequences of this development while receiving relatively limited direct benefit.

I believe the interests of communities living closest to the development deserve significant consideration.

7. Dark skies and night-time impacts

The Hebrides are valued for their exceptionally dark skies. The aviation warning lights required on offshore turbines have the potential to introduce significant light pollution into an area where darkness forms an important part of the natural environment.

8. Irreversible change

While I recognise the importance of renewable energy in addressing climate change, I do not believe every location is suitable for industrial-scale development. The west coast of Scotland contains some of the country's most iconic and least disturbed coastal landscapes. Once transformed by a development of this scale, these landscapes cannot be returned to their previous condition.

Renewable energy should be developed in locations where environmental and community impacts are minimised. In my view, this proposal fails to achieve an appropriate balance between the need for renewable generation and the protection of nationally important landscapes and island communities.

For these reasons, I respectfully request that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm application.

Thank you for considering my representation.

Yours faithfully,

[Redacted]

Sent from my iPhone

Member of the Public 4938

From:	**[Redacted**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	MD-00012385/ MD-00012386 - MachairWind Limited – MachairWind Offshore Wind Farm – Windfarm Development Area - EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 15 August 2026
Date:	07 July 2026 11:39:54

I wish to lodge a clear objection to the Machair Wind Offshore Wind Farm proposal northwest of Islay.

The development area overlaps established scallop and crab grounds that our fleet relies on. Displacing vessels from these grounds will cause direct financial harm, increase safety risks, and intensify pressure on remaining areas. The EIA does not adequately assess these impacts.

The turbine layout and construction traffic present serious navigational hazards for small working vessels, especially in winter conditions. Local operators have not been meaningfully consulted, despite being the group most affected.

The proposal also raises concerns about long-term damage to benthic habitats and disruption to species vital to the inshore fishery. Socio-economic impacts on Islay's working community are understated.

For these reasons, I object to the project in its current form and request that consent is not granted until fishing impacts, vessel safety, and island livelihoods are properly addressed.

Kind Regards

[Redacted]

[Redacted]

Member of the Public 4939

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	OBJECTION to Section 36 Consent: MachairWind Offshore Wind Farm (EC00005391)
Date:	22 July 2026 10:21:38

To whom it may concern,

I am writing to register my formal objection to the Section 36 consent application for the MachairWind Offshore Wind Farm (Reference: EC00005391). As a resident of the Isle of Tiree, I am deeply concerned by the unmitigable scale and proximity of this proposed development.
My objection is based on the following critical impacts to our island and its environment:

* Severe Seascape Degradation: The proposal to install up to 144 massive, industrial-scale turbines directly northwest of Islay will profoundly alter the open, pristine Atlantic horizon visible from Tiree. Located roughly 18 miles from Hynish, this vast array will permanently industrialise a globally renowned, dark-sky, and wild coastal vista. This visual intrusion directly threatens Tiree's fragile tourism economy, which relies entirely on visitors who come to experience our untouched beaches and natural landscapes.
* Threats to Local Marine Wildlife: The waters surrounding Tiree and the wider Sea of the Hebrides are recognized as a global hotspot for sensitive marine megafauna, particularly basking sharks and cetaceans like minke whales and dolphins. The prolonged underwater noise and disruption from construction, drilling, and cable-laying present an unacceptable ecological risk to these species.
* Avian Impacts: The development area sits in close proximity to critical migratory flyways and nesting sites for vulnerable seabirds and unique local species. The cumulative collision and displacement risks cannot be adequately mitigated.

This is the sea where minke and humpback whales feed. Where dolphins travel. Where basking sharks and birds such as puffins and corncrakes migrate.
Sustainable energy should not be built at the detriment of our fragile wildlife habitats and in what should be classed as a marine protected area!

*At no point in the life span of these wind farms will they not be causing harm to the environment, the habitats and the wildlife within, from the piling stage to the working life span which only averages 25 years, to the waste and pollution left once they are no longer in use.
The impact is not worth the short-term (25 year) energy production which can hardly be classed as SUSTAINABLE energy production! The very definition of the word sustainable in the Oxford dictionary is; something that can continue for a long time, or it uses natural things and energy in a way that does not hurt the environment!

The immense environmental and socio-economic cost of this project to the communities of the Inner Hebrides far outweighs its benefits. I strongly urge the Scottish Ministers to refuse Section 36 consent for this application.
Yours faithfully,
[Redacted]

Date: 22/07/2026

Member of the Public 4940

From: **[Redacted]**
To: **[Redacted]**

Subject: Machir Off Shore Wind Farm
Date: 14 August 2026 21:33:17

I wish to notify you of my strong opposition to this development.

I believe that it is unnecessary, unsightly and damaging to the environment and tourist industry of the West of Scotland.

The costs of transmission and the carbon footprint of the concrete and steel involved make it economically foolish. The fact that any return to localities will not be announced until later makes a mockery of local consultation.

As a householder on the island of Islay I am only too aware of the powerful local sentiment hostile to this development. I will therefore send a copy of this objection to Islay's MSP, Jenni Minto.

Sincerely,

[Redacted]

Member of the Public 4941

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to the Proposed MachairWind Offshore Wind Farm
Date:	12 August 2026 16:01:17

As a visitor to the Ross of Mull and the islands within sight of the proposed MachairWind development, I write to object to this application.

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. Why I am writing: a visitor's perspective

I am not a resident of these islands, and I do not pretend to speak for them. I write as a visitor to this coast, and I want the Ministers to understand what draws people like me back, again and again, because it is precisely what this application would take away.

I come here for what the wider landscape does to a person: an open Atlantic horizon uninterrupted by anything built by human hands, dark skies undimmed by artificial light, and a stillness that has become rare almost everywhere else. That is not a minor amenity. It is the whole reason to come, and it is exactly what the people who live here depend on for their livelihood, whether they run a guesthouse, a shop, a boat trip, or simply share their home with visitors like me for a season.

I know that if this development goes ahead, I would stop coming. Not as a protest, but because what I come for would no longer be there to find. A visitor looking out at 144 turbines, some as tall as 335 metres, standing permanently across that horizon is not looking at the island the communities objecting to this proposal are trying to protect. If people like me stop coming, in the numbers the applicant's own consultants concede cannot be ruled out, that loss falls first and hardest on the very island communities this application has never properly assessed.

3. What I am asking

I am asking the Scottish Ministers not to let that happen to people who have done nothing to deserve it, and who have already told the Ministers, in detail and at length, exactly what is at stake. I ask the Scottish Ministers to refuse consent under section 36 of the Electricity Act 1989, and I ask the Marine Directorate to refuse the associated marine licences under Part 4 of the Marine (Scotland) Act 2010.

Conclusion

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I object to the proposed MachairWind Offshore Wind Farm and ask that consent be refused.

[Redacted]

Visitor to the Ross of Mull and the surrounding islands

Member of the Public 4942

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Macair Wind Proposal - Objection
Date:	13 August 2026 23:22:38

Machair Off shore Wind Facility.
I am lodging an objection to the development for the following reasons.
1. Wind and ocean tides and currents are inextricably linked and play a major role in maintaining environmental stability, on and off shore, with respect to weather and ocean ecosystems. These effects are not a localised issue, but are interconnected on a global level.
Wind turbines are known to cause changes in temperature and the movement of air locally and regionally.
The construction of supporting structures below sea level further affect currents.
Such changes directly impact on marine ecology, with indirect effects (i.e. changes in air movement and hence weather patterns) on land affecting environment and habitats. At this time, there is insufficient study to fully determine long term effects.
Given the **Gulf Stream path changes and the implications for the collapse of the Atlantic Meridional Overturning Circulation, the large Machair Wind proposal is adding to an unstable situation.**
A threat to marine ecosystems is an additional strain on food security.

In addition to the operational disruption to the weather, environment and ecosystems, there is the question of upstream and downstream affects in the life cycle.
Downstream there is decommisioning. .What little there is regarding decommissioning plans and responsibility is also vague.
Support structures are to be left in the sea?
Waste management, disposal and recycling in general, even from infirmation from inside the industry, are not well established, to say the least.

On the upstream side, there is the energy required to make the permanent magnets at the heart of the electricity generating system. This must be taken into account when determining how " green" the outcome is. As must the energy used in the construction process.
I welcome energy that has low environmental impact, but the impact cannot have a simplistic narrow field of view on the energy produced being "green". A full life cycle assessment is needed to avoid problems in a nearby future.

4. Finally, while much energy is produced in Scotland, using Scotland's resources , there is no direct benefit to the people and communities. "Community fund" donations do not compensate for the affect on our environment. The rapid expansion of off shore Wind facilities needs to be reigned in, with people of Scotland having more time and fuller information to reach a decision on a safe and sustainable balance between energy production, climate, water and food security.

[Redacted]

Sent from AOL on Android

Member of the Public 4943

From: [Redacted]
To: MD Marine Renewables
Subject: Proposed Machair wind farm
Date: 13 August 2026 12:50:16

Thank you for hopefully taking on board this,one of the many objections to the above proposal.There are many more eloquent communications communications than I can manage and maybe i would be repeating what,s already been said.However as a full time resident of Mull,I add my voice.

It does strike me though,that we cannot be 'bought' by what will no doubt be promises of large grants which will no doubt be promised for 'community' projects irrespective of the untold damage which would occur. We may not have a National Park in this area,but in effect this is what our seas should be,can you imagine a wind farm application even being attempted in the heart of the Yorkshire Dales or Cotswolds?

[Redacted]

Member of the Public 4944

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to the Proposed MachairWind Offshore Wind Farm
Date:	16 August 2026 08:21:23

As a long standing visitor to the Ross of Mull and the islands within sight of the proposed MachairWind development, I write to object to this application.

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. Why I am writing: a visitor's perspective

I am not a resident of these islands, and I do not pretend to speak for them. I write as a frequent visitor to this coast since 2023, and I want the Ministers to understand what draws people like me back, again and again, because it is precisely what this application would take away.

I come here for what the wider landscape does to a person: an open Atlantic horizon uninterrupted by anything built by human hands, dark skies undimmed by artificial light, and a stillness that has become rare almost everywhere else. That is not a minor amenity. It is the whole reason to come, and it is exactly what the people who live here depend on for their livelihood, whether they run a guesthouse, a shop, a boat trip, or simply share their home with visitors like me for a season.

I know that if this development goes ahead, I would stop coming. Not as a protest, but because what I come for would no longer be there to find. A visitor looking out at 144 turbines, some as tall as 335 metres, standing permanently across that horizon is not looking at the island the communities objecting to this proposal are trying to protect. If people like me stop coming, in the numbers the applicant's own consultants concede cannot be ruled out, that loss falls first and hardest on the very island communities this application has never properly assessed.

3. What I am asking

I am asking the Scottish Ministers not to let that happen to people who have done nothing to deserve it, and who have already told the Ministers, in detail and at length, exactly what is at stake. I ask the Scottish Ministers to refuse consent under section 36 of the Electricity Act 1989, and I ask the Marine Directorate to refuse the associated marine licences under Part 4 of the Marine (Scotland) Act 2010.

Conclusion

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I object to the proposed MachairWind Offshore Wind Farm and ask that consent be refused.

[Redacted]

Visitor to the Ross of Mull and the surrounding islands

Member of the Public 4945

[Redacted]

Marine Directorate
Licensing Operations Team
375 Victoria Road
Aberdeen
AB11 9DB

28/07/26

Dear Sir/Madam

Re: MachairWind Offshore Wind Farm

Reference: 00012385 / 00012386

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals comprising application 00012385 for 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.

This objection is based on planning, environmental and statutory considerations. It focuses on whether the applicant has demonstrated compliance with the legal and policy requirements governing these applications. The burden rests upon the applicant to provide sufficient evidence that the statutory tests have been met. Having reviewed the Environmental Impact Assessment, supporting documents and consultation responses, I do not consider that this burden has been discharged.

The proposal comprises an offshore wind farm of up to 144 turbines, each up to 335 metres in height, within a development area of approximately 448 km² located north-west of Islay and west of Colonsay. Owing to its scale and location, the proposal has the potential to affect nationally important landscapes, cultural heritage, protected habitats and island communities. These impacts must therefore be assessed against the statutory and policy framework that governs the determination of the applications.

Statutory and Policy Framework

Scottish Ministers are required to determine these applications in accordance with the Electricity Act 1989, the Marine (Scotland) Act 2010, the Environmental Impact Assessment Regulations, the Habitats Regulations, Scotland's National Marine Plan and National Planning Framework 4 (NPF4).

Collectively these require the protection of nationally important landscapes, historic environment interests, biodiversity, protected sites, island communities and the proper assessment of cumulative effects. They also require decisions to be based upon adequate environmental information and robust evidence demonstrating compliance with the relevant statutory tests.

My objection is that the applicant has not demonstrated compliance with these requirements. In particular, the evidence submitted does not reliably establish the scale of landscape and heritage effects, does not adequately assess impacts on island communities, does not demonstrate compliance with the Habitats Regulations, and does not provide a reliable assessment of cumulative

effects. These deficiencies are fundamental to the determination of the applications and weigh against the grant of consent.

Seascape, Landscape and Visual Effects

The applicant's assessment does not demonstrate that the proposal complies with the statutory and policy tests intended to protect Scotland's nationally important landscapes and seascapes.

Although the methodology does not specify a distance beyond which significant effects cease, the applicant's own assessment consistently assigns lower magnitudes of change to highly sensitive receptors located beyond approximately 20 kilometres from the development. Chapter 16 and its appendices indicate that effects are generally assessed as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres. Consequently, the magnitude of change appears to reduce primarily because of viewing distance rather than because of the sensitivity or importance of the receiving landscape.

This approach has important consequences for designated landscapes and island communities situated beyond that distance. If the magnitude of change is systematically moderated, the resulting assessment inevitably understates the significance of effects on those landscapes which Scottish Ministers are required to protect. The applicant has not demonstrated that this outcome is consistent with its stated methodology or that it provides a reliable basis for decision-making.

The visualisations submitted with the application were prepared in accordance with NatureScot guidance. However, that guidance makes clear that photomontages cannot replicate the true scale, depth, field of view or visual experience encountered on site. Likewise, the accompanying wirelines are technical illustrations rather than independent evidence capable of correcting those limitations. They should therefore be regarded as indicative rather than definitive representations of the development.

The proposal would also introduce permanent aviation and navigation lighting into a seascape that is presently characterised by the absence of artificial lighting. For the proposed operational life of approximately 35 years, this would fundamentally alter the night-time character of the Atlantic horizon. This change is not temporary or incidental but would become an enduring feature of the landscape and seascape experienced from neighbouring islands and coastal communities.

The applicant accepts that the proposal engages the policies intended to protect nationally important landscapes and seascapes, including NPF4 Policy 4, NPF4 Policy 11 and General Policy 7 of Scotland's National Marine Plan. However, the evidence submitted does not demonstrate that the proposal satisfies those policy tests. In particular, the assessment has not shown that the magnitude of landscape and visual effects has been reliably established. Without a robust assessment of those effects, Scottish Ministers cannot be satisfied that the proposal complies with the statutory and policy framework governing nationally important landscapes and seascapes.

Cultural Landscape, Archaeology and the Historic Environment

The applicant states that the assessment of effects on the setting of heritage assets follows the methodology developed by Historic Environment Scotland. That methodology requires more than a description of visual change. It requires an assessment of whether changes to the setting of a heritage asset affect the contribution that setting makes to its cultural significance and whether the integrity of that setting is retained.

My concern is that the assessment does not demonstrate that this essential evaluative stage has been undertaken. As identified in the independent Methodological Audit of Appendix 14.3, the assessment describes visibility, distance, retained views, skyline occupation and monument prominence before concluding that the integrity of setting is retained. However, it does not explain how that conclusion has been reached or evaluate whether the contribution made by setting to the significance of the asset has been preserved. The conclusion therefore appears to be asserted rather than demonstrated.

This distinction is important because the applicant's own baseline recognises that the significance of many heritage assets in the area extends beyond their physical remains. It acknowledges that their cultural value derives from pilgrimage, arrival by sea, movement through the landscape and the enduring relationship between monuments, spirituality, landscape and seascape. These are dynamic qualities experienced across the wider cultural landscape rather than from isolated viewpoints.

Historic Environment Scotland's consultation response reinforces this concern by requesting additional viewpoints to better assess the wider setting of these nationally important assets. That request indicates that the information currently before Ministers may not adequately represent the experiential and cultural dimensions of the historic environment upon which the applicant's conclusions depend.

The heritage assessment is also dependent upon the landscape and seascape assessment. If, as argued elsewhere in this objection, the magnitude of landscape effects has been systematically understated, then the conclusions reached regarding the integrity of heritage settings are likewise unreliable. The two assessments cannot be separated; an understatement of landscape effects inevitably influences the assessment of heritage impacts.

Accordingly, the applicant has not demonstrated that the proposal satisfies the statutory and policy requirements relating to the protection of the historic environment. In the absence of a transparent assessment showing how the integrity of setting has been evaluated and preserved, Scottish Ministers cannot be satisfied that the effects on nationally important heritage assets have been properly assessed.

The western seaways between Islay, Colonsay, Oronsay and Iona form part of one of Scotland's most significant historic and cultural landscapes. These waters were the principal routes by which Christianity spread through the Hebrides during the sixth and seventh centuries. Monastic communities did not exist as isolated monuments but as parts of an interconnected maritime landscape whose cultural significance continues to derive from the relationship between the sea, the islands and the surviving archaeological sites. Any assessment of setting should therefore recognise that this heritage is experienced across the wider seascape and not solely from fixed viewpoints at individual monuments.

Effects on Island Communities, Tourism and the Local Economy

The applicant has not demonstrated that the effects of the proposal on the island communities of Islay, Colonsay and Oronsay have been adequately assessed.

These islands possess distinctive economies and communities whose prosperity is closely linked to landscape, seascape, cultural heritage, tranquillity and remoteness. The applicant's own baseline acknowledges that these qualities underpin the visitor economy and contribute directly to the sustainability of island life. Any permanent change to those qualities therefore has the potential to

affect not only tourism but also local businesses, employment, population retention and community wellbeing.

Despite recognising these characteristics, the socio-economic assessment does not provide a place-based evaluation of the communities most directly affected by the proposal. Chapter 18 contains detailed assessments of port communities, yet no comparable level of analysis is undertaken for the island communities that face the proposed development across the Atlantic. Instead, conclusions are drawn from broad regional assessments that fail to reflect the particular circumstances and vulnerabilities of small island economies.

The applicant's own consultants identify habitability as a potential pathway through which offshore wind development could affect island communities. However, no assessment has been undertaken of how the proposal may influence the qualities that make these islands attractive places in which to live, work and visit. Without that analysis, the conclusion that the affected island communities have a low sensitivity to tourism impacts is not supported by place-specific evidence.

This omission is particularly significant because the economies of Islay, Colonsay and Oronsay are unusually dependent upon the very qualities that the applicant acknowledges may be altered by the development. Increased visitor numbers do not reduce that sensitivity; they increase the communities' reliance upon maintaining the landscapes, seascapes and cultural character that attract visitors in the first place.

The assessment also fails to recognise the unequal distribution of costs and benefits. The most enduring effects of the proposal would be experienced by nearby island communities through changes to landscape character, seascape, tranquillity and the setting of nationally important heritage assets. By contrast, the principal financial returns would accrue to the project developers and their shareholders rather than to the communities experiencing those effects. While community benefit funding may be offered, such payments cannot compensate for permanent changes to nationally important landscapes or be treated as evidence that statutory planning and environmental tests have been satisfied.

The proposal therefore does not demonstrate compliance with the requirements of the National Marine Plan, National Planning Framework 4 or the Islands (Scotland) Act 2018 in relation to island communities. Having identified island communities as requiring particular consideration, the applicant has not undertaken the place-based assessment necessary to demonstrate that their interests have been properly understood or safeguarded. In those circumstances, Scottish Ministers cannot be satisfied that the statutory duties owed to island communities have been fulfilled.

Ecology, Biodiversity and the Habitats Regulations

The proposed development would be constructed, operated and ultimately decommissioned within a marine environment of recognised ecological importance. The development area contains Priority Marine Features and Annex I habitats, while the surrounding waters support internationally important populations of seabirds, marine mammals and other protected species. Given the scale and duration of the proposal, careful assessment is required to demonstrate that these interests can be protected.

Of particular significance is the applicant's submission of a **Without Prejudice Derogation Case** together with a **Without Prejudice Guillemot Compensation Plan** for the North Colonsay and Western Cliffs Special Protection Area. These documents are not routine components of an application. Their inclusion recognises that adverse effects on the integrity of the protected site

cannot be confidently excluded and that Scottish Ministers may need to consider the derogation provisions of the Habitats Regulations.

Under the Habitats Regulations, consent may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of a protected site, unless the strict statutory derogation tests are met. The evidential burden rests upon the applicant, and any remaining reasonable scientific doubt must weigh against consent. Mitigation proposals, compensation measures and future monitoring cannot substitute for demonstrating compliance with these statutory requirements.

The applicant's own documentation therefore illustrates the central issue. Rather than demonstrating that adverse effects on site integrity can be ruled out, it acknowledges uncertainty and seeks to address the consequences should those effects ultimately be found to occur. While this may represent prudent contingency planning, it does not itself satisfy the statutory test that Scottish Ministers must apply.

The proposal also engages the protective provisions of the National Marine Plan and National Planning Framework 4, both of which reflect the requirements of the Habitats Regulations. These policies require robust scientific evidence before consent can be granted. On the material presently before Ministers, that evidential threshold has not been demonstrated.

Accordingly, the applicant has not established that the proposal complies with the statutory requirements governing internationally protected habitats and species. Until those requirements are satisfied, Scottish Ministers cannot lawfully conclude that consent should be granted.

Cumulative and In-Combination Effects

The applicant has not demonstrated that the cumulative effects of the proposal have been fully and reliably assessed.

The application before Scottish Ministers relates only to part of the overall project. Essential components, including the export cable corridor and associated onshore transmission infrastructure, are to be considered through separate consenting processes. Although these works are indispensable to the operation of the wind farm, their environmental effects have not been assessed as part of the project currently under determination.

This fragmented approach creates a significant risk that the overall environmental effects of the development will be underestimated. The cumulative assessment considers only those elements presently before Ministers, rather than the project as a whole. Consequently, decision-makers are not provided with a complete understanding of the combined landscape, heritage, ecological and socio-economic consequences of the development.

The reliability of the cumulative assessment is further weakened because it is built upon baseline assessments that are themselves disputed. As set out elsewhere in this objection, the landscape and seascape assessment appears to moderate the magnitude of effects at greater distances, the heritage assessment relies upon those landscape conclusions, and the socio-economic assessment does not contain a place-based evaluation of the affected island communities. If those underlying assessments underestimate the effects of the proposal, the cumulative assessment necessarily understates the combined impacts.

The applicant's own supporting evidence identifies the relevance of the National Marine Plan, National Planning Framework 4 and the Environmental Impact Assessment Regulations to

cumulative assessment. Those policies require decision-makers to understand the likely significant effects of the project in combination with other existing, consented and reasonably foreseeable developments. On the material presently submitted, that objective has not been achieved.

Scottish Ministers must determine the applications on the basis of the environmental information currently before them. Reliance upon future applications, subsequent approvals or additional assessments cannot remedy deficiencies in the present Environmental Impact Assessment. Until the cumulative and in-combination effects of the project have been adequately demonstrated, the applicant has not discharged the evidential burden required to support consent.

Planning Balance

I recognise that the proposed development would contribute towards Scotland's renewable energy and climate change objectives. I do not object to renewable energy development in principle. However, support for renewable energy does not remove the statutory obligation to protect nationally important landscapes, the historic environment, protected habitats and island communities, nor does it reduce the evidential burden resting upon the applicant.

In this case, the applicant has acknowledged that the proposal would give rise to significant effects on nationally important landscapes and seascapes. At the same time, the evidence submitted does not demonstrate that the effects on the historic environment have been assessed in accordance with the applicant's own methodology, nor that the statutory requirements of the Habitats Regulations have been satisfied. The socio-economic assessment does not provide a place-based assessment of the island communities most directly affected, while the cumulative assessment relies upon baseline assessments whose conclusions are themselves disputed.

These are not minor or technical deficiencies. They concern the principal matters that Scottish Ministers are required to consider when determining the applications. Where there is uncertainty regarding landscape, heritage, ecology and island communities, that uncertainty cannot properly weigh in favour of consent. Rather, it indicates that the applicant has not demonstrated compliance with the statutory and policy framework governing the proposal.

Schedule 9 to the Electricity Act 1989 requires Ministers to have regard to the preservation of natural beauty and the conservation of sites, buildings and objects of architectural, historic and archaeological interest. The National Marine Plan and National Planning Framework 4 reinforce those duties through policies intended to safeguard nationally important environmental and cultural assets. Those protections are not displaced simply because a proposal would generate renewable electricity.

Taken together, the evidence before Ministers does not demonstrate that the statutory tests governing this proposal have been met. In those circumstances, the planning balance cannot reasonably be struck in favour of the development. The unresolved uncertainties and acknowledged adverse effects carry substantial weight and justify the refusal of consent.

Summary and Request for Refusal

For the reasons set out in this objection, the applicant has not demonstrated compliance with the statutory and policy requirements governing these applications.

The evidence before Scottish Ministers does not provide a reliable basis for concluding that the proposal satisfies the tests established by the Electricity Act 1989, the Marine (Scotland) Act 2010,

the Habitats Regulations, the National Marine Plan and National Planning Framework 4. In particular:

- the landscape and seascape assessment does not demonstrate that the magnitude of effects has been reliably assessed;
- the heritage assessment does not show that the integrity of the setting of nationally important heritage assets has been evaluated in accordance with the applicant's own methodology;
- the effects on island communities have not been assessed through an appropriate place-based analysis;
- the Habitats Regulations tests have not been demonstrated to have been satisfied;
- the cumulative assessment does not provide a reliable assessment of the project as a whole.

These are fundamental matters that go to the heart of the decision before Scottish Ministers. They are not minor deficiencies capable of being resolved through planning conditions or post-consent monitoring. The applicant bears the burden of demonstrating that consent can lawfully and properly be granted. In my view, that burden has not been discharged.

I therefore respectfully request that Scottish Ministers **refuse consent** under section 36 of the Electricity Act 1989 and **refuse the associated marine licence** under Part 4 of the Marine (Scotland) Act 2010.

Should Ministers conclude that they are not presently able to refuse the applications, I request that no determination is made until further environmental information has been obtained to address the deficiencies identified in this objection. That information should include a more robust assessment of landscape and seascape effects, the setting of heritage assets, the impacts on island communities and the cumulative effects of the project as a whole.

Finally, whatever determination is made, I ask that Scottish Ministers expressly address in their decision notice the issues raised regarding landscape and seascape, cultural heritage, island communities, ecological effects and cumulative impacts.

Yours faithfully,

[Redacted]

Member of the Public 4946

[Redacted]

Marine Directorate
Licensing Operations Team
375 Victoria Road
Aberdeen
AB11 9DB

15/08/26

Re: MachairWind Offshore Wind Farm

Reference: 00012385 / 00012386

Dear Sir/Madam,

I wish to formally and strongly object to the application submitted by MachairWind Limited on 25 June 2026 for consent under section 36 of the Electricity Act 1989, and for the marine licences required under Part 4 of the Marine (Scotland) Act 2010, in respect of the proposed MachairWind Offshore Wind Farm in the waters north-west of Islay (Marine Directorate references 00012385 and 00012386).

The proposed project is of a substantial offshore wind energy development, consisting of between 91 and 144 turbines (335m or 280m respectively), covering an area of about 448 square kilometres.

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. In this instance, the applicant has failed to meet this evidential burden, and accordingly, I contend that consent for the development should be withheld.

The Statutory 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. The applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence

submitted does not establish that these requirements have been sufficiently addressed or fulfilled.

Alongside the Electricity Act 1989, other statutes and policies relevant to this application include Marine (Scotland) Act 2010, Scotland's National Marine Plan (GEN 5 - climate change, GEN6 - historic environment, GEN7 - seascape, landscape and visual impact, GEN 9 - natural heritage, GEN 13 - noise, GEN 18 - engagement, GEN 19 - sound evidence and precaution and GEN 21 - cumulative impacts). Note, GEN 1 establishes a presumption in favour of sustainable development, but that presumption is available only to proposals which accord with the Plan's policies, and so is not engaged where those policies are breached. Also, policies applicable are in National Planning Framework 4(NPF4) and Argyll and Butes Local Development Plan 2, adopted on 28 February 2024.

In NPF4, Policy 4(a) states that if the type, location or scale of the development will have an unacceptable impact on the natural environment, it will not be supported. Policy 30 of the Local Development Plan supports renewable energy development where it is consistent with the principles of sustainable development and where it can be adequately demonstrated that there would be no unacceptable environmental effects, whether individual or cumulative, on local communities, the natural and historic environment, landscape character and visual amenity. The Conservation (Natural Habitats, &c.) Regulations 1994 set up to protect natural habitats states competent authorities, including government departments, public bodies, and planning authorities, have a duty to consider the Habitats Directive in exercising their functions, ascertaining the absence of adverse effect on site integrity before consent may be given.

Seascape, Landscape and Visual Effects

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in such evidence. This guidance acknowledges that printed visualisations are unable to fully replicate the true scale experienced by a viewer on site.

Taking information from the EIAR, Appendix 16.3, Coastal Character Baseline and Assessment (LUC, November 2025), Tables 2.25 to 2.34. It is not apparent how the magnitude of the impact on the coastal character is ascertained. At a quick glance you may assume it is a reflection of distance however, areas classed as 'high sensitivity' are given medium or low magnitude when the distance is the same. Also, the visual area occupied by the turbines seem to have inadequate inclusion in the effect on the coastal character. For instance, comparing CCA 18 Sgairail occupying 59 degrees vision of the horizon at 18 - 24 km given a high sensitivity with medium magnitude is ranked moderate and significant, whereas CCA 19 Loch Gruinart at 15 – 25 km is given high sensitivity with low magnitude resulting in a 'minor, not significant' effect. This does not make any sense.

NPF4 Policy 11(e)(ii) treats significant landscape and visual impacts as generally acceptable only where they are localised and/or appropriate design mitigation has been applied. The proposed development impacts a large area, including Islay, Colonsay, Oronsay, Jura, Mull and Iona; this is not localised.

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 its 35-year operational lifespan. I note though that NPF4 Policy 11(f) records the expectation that areas identified for wind farms are suitable for that use in perpetuity, and Policy 11(a)(i) supports repowering, extension and expansion; the applicant's seabed lease runs for 60 years. This change is not merely a temporary thing but an approval will carry significant implications for the intrinsic qualities of the night time seascape.

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.

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.

Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment risks underrepresenting the full extent of heritage impacts by insufficiently capturing the broader cultural landscape and experiential qualities integral to the affected assets. The baseline acknowledges that the cultural significance arises from dynamic elements such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape, encompassing the relationships between monuments, spirituality, and the surrounding landscape and seascape. These attributes are experienced primarily through movement rather than from static viewpoints. Moreover, Historic Environment Scotland’s consultation responses, as recorded in the application, explicitly requested additional viewpoints to ensure these wider qualities are properly represented. Without incorporating these perspectives, the assessment may fail to fully reflect the heritage assets’ cultural significance. Consequently, the evaluation should be expanded to address these experiential and landscape relationships comprehensively to inform an accurate understanding of the heritage impacts.

Of note, Historic Environment Scotland on 28 April 2025 reviewed a draft wireline visualisation prepared from viewpoint Beinn a’ Chaisteil, identifying the turbines would occupy the whole of the monument’s seaward horizon.

Socio-Economic

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.

Inshore fishing forms part of Islay's economy as well as some of the other islands affected by the proposed development. The EIAR, Chapter 12, identifies a reduction in or exclusion from the development area, with displacement of fishing activity leading to potential conflict and increased fishing pressure elsewhere.

The islands rely heavily on ferry services for passengers and goods. In Chapter 13 of the EIAR, Shipping and Navigation, the proposal estimated 117 vessels and 5,699 vessel return trips over the 5 years of construction and some 423 vessel movements and 576 helicopter movement each year in its operational phase. The increased traffic will have knock on effects to not only the fishing industry but port access and emergency response capability.

Mull's west-facing tourism economy, including wildlife boat operations and the accommodation sector of its western townships, depends on the unspoiled nature of these seascapes. The proposed development would industrialise this environment, yet none of these communities has been afforded a detailed, location-specific assessment. This gap in the applicant's evaluation undermines confidence that the full extent of visual, economic, and community impacts has been adequately considered, leaving significant concerns unaddressed.

GEN 19 requires decisions to rest on sound socio-economic and scientific evidence and directs that, where evidence is inconclusive, reasonable efforts be made to fill the gaps and precaution be applied.

Marine Environment

In the EIAR Chapter 8, Benthic Ecology, the assessment confirms the presence of Priority Marine Features and Annex I habitats within the development area itself. GEN 9 of the National Marine Plan states development and use of the marine environment must not result in significant impact on the national status of Priority Marine Features. The applicant also records that the wider marine environment of this area forms part of the Sea of the Hebrides Marine Protected Area.

In Chapter 9 of the EIAR, Fish (including Basking Shark) and Shellfish, Appendix 9.1, identifies an underwater noise zone of influence extending to 88 km. GEN 13 of the National Marine Plan requires that significant adverse effects of man-made noise be avoided, especially on species sensitive to such effects. I do not possess any qualification in marine biology but I am very aware of the sensitivity of Cretaceans to noise as some species communicate over great distances, beyond 88 km. The noise during construction and the rotational noise/vibrations will be of great significance and cause distress to many in and beyond the stated noise zone of influence.

Under the Habitats Regulations, 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. 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 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.

Cumulative

This proposal fails to provide a complete and coherent evaluation of the project's impacts as it does not include connection 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.

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.

Summary

This proposal 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.

Yours faithfully

[Redacted]

Member of the Public 4947

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Formal objection to the Section 36 consent and marine licence applications for the MachairWind Offshore Windfarm
Date:	25 July 2026 19:23:39

To: Scottish Ministers, Marine Directorate – Licensing Operations Team
Email: MD.MarineRenewables@gov.scot

Dear Sir or Madam,

I am writing as a resident of the Isle of Mull to object formally to the applications submitted by MachairWind Limited for the proposed MachairWind Offshore Windfarm.

I support the transition from fossil fuels to renewable energy and recognise the urgent need to address climate change. My objection is not to offshore wind power in principle. It concerns the scale, location and likely consequences of this particular development, together with serious questions about whether its environmental, cultural and socioeconomic effects have been assessed adequately.

MachairWind would introduce up to 144 exceptionally large turbines into one of Scotland's most distinctive and least industrialised Atlantic seascapes. The development area extends over approximately 448 square kilometres. The turbines could reach approximately 335 metres above sea level and would be situated around 20 kilometres from parts of Mull and Iona and considerably closer to Colonsay.

This is not a modest offshore development on a remote horizon. It would be a major industrial installation, visible across an extensive part of the Inner Hebrides and affecting places whose landscape, cultural history, wildlife and visitor economy are of national and international importance.

Seascape, landscape and visual effects

The proposed development would fundamentally alter the character of the seascape south and west of Mull and Iona.

This landscape is defined by open water, uninterrupted horizons, changing light and weather, and the visual relationships between Mull, Iona, Staffa, Colonsay, Islay and the smaller islands. Its value cannot be measured simply by calculating the apparent height of individual turbines or their distance from selected viewpoints. Its significance lies

in the character of the whole seascape and in the rarity of extensive maritime horizons that remain substantially free from industrial infrastructure.

The proposal would introduce repeated vertical structures across a wide arc of the horizon. The turbines would be visible during the day and would require aviation and navigational lighting at night. The result would be a permanent engineered presence in a landscape presently characterised by its natural scale, darkness and sense of remoteness.

The visual effects would be especially serious when experienced from Iona, the Ross of Mull, Staffa and other islands and coastal locations. They would also affect people travelling through the seascape by ferry and smaller vessels. Such journeys are an important part of how the Inner Hebrides are perceived and experienced; they should not be treated as incidental or transitory viewpoints.

I am concerned that conventional panoramic visualisations can make offshore turbines appear smaller and less prominent than they are likely to seem to the human eye. That concern becomes particularly important where turbines of an unprecedented or near-unprecedented height are proposed relatively close to land.

The Scottish Ministers should not rely on a limited selection of developer-chosen viewpoints or visualisations. Before consent can be considered, there should be independently verified visual representations from all affected communities and significant locations, including representative viewpoints on the Ross of Mull, Iona, Staffa and the principal sea routes. These should show clear daylight, poor visibility, dawn, dusk and night-time lighting conditions.

The absence of development on the present horizon is itself a landscape characteristic. The assessment should therefore address the loss of that undeveloped character, rather than treating the effect solely as the visibility of individual turbines at a given distance.

Iona and the cultural landscape of the Inner Hebrides

Iona is not merely another visual receptor. Its landscape and seascape are inseparable from its cultural, religious and historical importance.

The island has been a place of worship, pilgrimage, burial, learning and cultural memory for approximately 1,500 years. Iona Abbey, the Nunnery, Reilig Odhráin, the historic route known as the Road of the

Dead and the island's wider archaeological landscape derive part of their meaning from their physical setting.

That setting includes the relationship between land, sea, sky and the open horizon. It is not confined to the boundaries of individual scheduled monuments or listed buildings.

The introduction of an extensive array of exceptionally tall turbines into this setting risks weakening the qualities of remoteness, contemplation, continuity and spiritual association through which Iona is experienced. The potential effect is not adequately described as a change to a view. It is a change to the setting and meaning of an internationally recognised cultural landscape.

The proposal may therefore cause substantial harm to the setting of nationally important heritage assets. Scottish Ministers should apply the greatest weight to the protection of those assets and their settings and should require a genuinely independent assessment of the cumulative effect on Iona's historic and spiritual landscape.

Effects on tourism and the island economy

Tourism on Mull and Iona depends heavily upon the quality of the natural environment, scenery, wildlife, tranquillity and cultural heritage. These are not peripheral features of the local economy: they are among its principal economic assets.

The effect of MachairWind cannot adequately be assessed by looking only at employment figures around existing windfarms elsewhere. Comparisons with larger mainland economies or places with different landscapes and visitor markets would not capture the vulnerability of small island communities.

Visitors come to Mull, Iona and the surrounding islands specifically to experience wildlife, undeveloped landscapes, open seascapes, cultural heritage, tranquillity and a relative absence of industrial infrastructure. Even a comparatively small change in visitor perceptions or behaviour could have significant consequences for accommodation providers, hospitality businesses, wildlife-tour operators, boat operators, shops, cultural organisations and the many people whose livelihoods depend directly or indirectly on tourism.

I am particularly concerned by the reported absence of meaningful, place-specific research involving Iona's residents, businesses and

visitors. Excluding a community because it is considered too small to form a statistically convenient sample is not a sound basis for concluding that significant effects will not occur. Small population size is a source of vulnerability, not a justification for overlooking the community.

Before any decision is made, an independent and locally grounded socioeconomic assessment should examine:

- the importance of undeveloped seascapes to the Mull and Iona visitor economy;
- visitor motivations and perceptions;
- the particular dependence of small island businesses on seasonal tourism;
- effects on wildlife and marine-tourism operators;
- possible displacement of visitors;
- cumulative effects alongside other proposed marine and energy developments; and
- whether any claimed employment and supply-chain benefits are specific, deliverable and accessible to the affected island communities.

General aspirations concerning jobs, investment or community benefit should not be treated as equivalent to secured benefits. Nor can voluntary or unspecified future community payments compensate for unacceptable environmental or heritage harm.

Marine ecology and ornithology

The waters and islands surrounding the development support internationally important seabird populations and a rich marine environment. Potentially affected species include seabirds travelling between breeding colonies and feeding areas, marine mammals, basking sharks, fish and benthic habitats.

The ecological consequences must be assessed across the whole lifespan of the project: survey work, construction, operation, maintenance and decommissioning. Relevant effects include collision risk, displacement from feeding areas, disturbance, underwater noise, changes to habitat, construction traffic and the barrier effect created by a very large turbine array.

Particular care is required in relation to seabird colonies associated with

the Treshnish Isles Special Protection Area and other protected sites. The assessment must consider whether birds from protected colonies use or pass through the development area, rather than relying principally on whether the turbines themselves fall within a designated boundary.

Seabird populations are already affected by multiple pressures, including avian influenza, climate-driven changes in food availability, fishing activity and other offshore developments. Against that background, uncertainty should not automatically be interpreted in the developer's favour.

Where there is reasonable scientific doubt about adverse effects on the integrity of protected sites, consent should not be granted unless the relevant legal tests are demonstrably satisfied.

Cumulative effects and project fragmentation

MachairWind must not be assessed in isolation. Its effects should be considered cumulatively with other existing and proposed offshore windfarms, transmission infrastructure, subsea cables, shipping activity and other marine development around western Scotland.

I am also concerned that the windfarm development area is being considered before the complete export-cable corridor and onshore transmission infrastructure have been brought forward for consent. Although supporting documentation may discuss elements of the wider project, the public does not yet have the opportunity to examine and respond to the complete final development through a single consenting process.

The windfarm, export cables, landfall, substations and grid connection are functionally dependent parts of one project. Scottish Ministers should be satisfied that the environmental consequences of the whole development have been assessed comprehensively and that separate applications do not obscure significant combined or cumulative effects.

Scale, design envelope and unresolved uncertainty

The application appears to retain considerable flexibility over the number, dimensions, design, foundations and precise positions of the turbines and associated infrastructure.

A design-envelope approach should not permit consent to be granted for a project whose final environmental effects cannot yet be known. The assessment must use a clearly justified worst-case scenario for each

receptor. The decision-maker and the public should not be required to assume that later design refinement will resolve effects that are presently uncertain.

This is particularly important because of the unprecedented combination of turbine height, number, development area and proximity to sensitive island landscapes. Experience derived from smaller turbines or developments much farther offshore may not provide a reliable guide to the effects of MachairWind.

Community views and environmental justice

The people living closest to the proposal would experience its landscape, ecological and economic consequences, yet the electricity would be exported through infrastructure connecting elsewhere and the level of direct community benefit remains uncertain.

Iona Community Council's consultation reportedly received responses from approximately 64% of island households, with 92% of those respondents supporting an objection. That is unusually strong evidence of local concern and should be given substantial weight. It cannot simply be balanced against general national statements of support for renewable energy.

The fact that local communities support renewable energy in principle makes this opposition particularly significant. It demonstrates that the issue is not resistance to climate action, but whether the transition is being pursued in the right places, at an acceptable scale and with proper regard for those who will bear its consequences.

Conclusion

I do not believe that the applications presently provide Scottish Ministers with an adequate basis for concluding that the likely significant effects of MachairWind have been identified, assessed and mitigated satisfactorily.

In particular, I remain concerned about:

- major adverse effects on the seascape and landscape character of the Inner Hebrides;
- harm to the setting and cultural significance of Iona;
- inadequate place-specific assessment of tourism and island economies;

effects on seabirds, protected sites and the wider marine environment;
- cumulative effects with other developments;
- the separation of the windfarm from later cable and onshore applications;
- uncertainty created by the broad design envelope; and
- the absence of clear, proportionate and secured benefits for the communities most affected.

I therefore ask Scottish Ministers to refuse the present applications.

If Ministers are not presently prepared to refuse them, determination should at minimum be suspended until the applicant has supplied the missing evidence, undertaken independent and genuinely place-specific assessments, demonstrated compliance with the relevant habitats and environmental legislation, and allowed affected communities a meaningful opportunity to respond to the complete project.

Please acknowledge this representation and ensure that it is recorded as a formal objection to all relevant MachairWind Section 36 and marine licence applications.

Yours faithfully,

[Redacted]

Member of the Public 4948

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to MachairWind
Date: 01 August 2026 09:21:59

I would like to register my strong objection to the MachairWind Scheme, on grounds of unproven economic reasoning and environmental destruction

[Redacted]

[Redacted]

If you wish to view the St. James's Place Partnership email disclaimer, please access the link below

https://www.sjp.co.uk/site-services/site-disclaimer/sjpp-email-disclaimer

Member of the Public 4949

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Objection to proposed MachairWind offshore Wind Farm.
Date:	13 August 2026 00:39:29

Please find below my objection to the applications made by Machair Wind Limited for consent under section 36 of the Electricity Act 1989 and for the associated marine licences under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed MachairWind Offshore Wind Farm (Marine Directorate references 00012385 and 00012386).

I am supportive of Scotland's advancement towards green, renewable energy. I feel this should be achieved in a green , sustainable way avoiding other pollutions to residents local to those energy sources. Visual pollution of iconic heritage sites and lightening the west coast's darkened night skies is an unacceptable price to pay for a rushed project to achieve green Scottish energy (exported directly to England with no direct benefit to the Scottish electricity grid nor local employment or economy)

The choice of the location for the wind farm appears illogical to me. Why create an industrial site in such a hostile, maritime environment with all the inherent problems with access, corrosion, weather and dangerous working conditions unless it is to avoid that site being within an area currently inhabited and appreciated by a resident population. So why would you then choose a site positioned so close to a idilic, remote, rural island community ?
I can only suppose it might be for economic reasons of building a wind farm attached to the sea-bed (using the relatively shallow sea shelf available at this location) rather than the more expensive floating, anchored turbines. Or has this site remained an option while other proposed sites have been dropped because there are so few residents here and voices to be heard from our remote island who could protect and save it from the permanent and devastating impact that such a wind farm would have on it ?

Please think again and consider carefully what you are proposing to sanction. Do you really want to be remembered as the government that allowed a wind farm to be place in front of the most beautiful, iconic Hebridean island as a short cut to speed up the production of green energy rather than taking the time , imagination and wisdom to locate the farm on a more realistic site.
Thank you for listening and for giving us Cholasachs a second chance.

Yours sincerely,

[Redacted]

Member of the Public 4950

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	Iona wind farm
Date:	01 August 2026 11:16:52

I wish to formally object to the proposed wind farm on Iona.
It is wrong for so many reasons, damage to habitat, wildlife, tourism. Etc
As with so many of these farms the benefit of the energy goes out with the local area and also out with Scotland.

Renewables are essential but need to be done in a more local and integrated way.
[Redacted]

Member of the Public 4951

From: [Redacte
To: MD Marine Renewables
Subject: Objection to Machair Wind proposal
Date: 28 July 2026 15:34:54

To the People Responsible !

My name is **[Redacted]**
I have the privilege of living in Iona and have done so for thirty five years.
As a Retreat House Director for fifteen of those years, I can testify to the restorative power experienced, by those who make their way to Iona, seeking spiritual renewal, a time apart from 'the busy' - or just renewal - and finding it. Vital for our kind, in this fragile world.

People come here from all over the globe!!

They travel from mainland Europe, Australia, Africa, America, Japan - even England, to spend time on this special island that is well known to be a 'thin' place - where the veil between heaven and us seems to be breachable!

To experience of the sheer beauty of the land vistas and the sea horizons, the clarity of light and the purity of the air, affects lives in profound ways.

Those who live here know this - and livelihoods are sustained through acts of hospitality and the ability to share our stories with each other and with visitors, be they pilgrim or not.
It is another of life's great privileges.

Sharing acquired knowledge of the flora and fauna, of the Golden and the Sea Eagle, naming the multitude of sea birds; the large and small marine life; the endangered Corn Crake with its enigmatic call and life cycle; the song of the skylark - - - the benefits are numinous, immeasurable.

Now we are threatened by a Spanish company wanting to erect vast numbers of the largest turbines, in the waters to the south of this holy island.
The proposed height will blot the horizon by day and at night, the coloured (red?) hazard lights…I have no words to describe the desecration.

Environmental Impact Assessment alone, would show that these are special places that must be preserved not industrialised!
Community impact assessment would confirm the vulnerable status of Hebridean coastal communities.
The Economic Assessment would show that the long term beneficiaries are the Spanish company and its shareholders!
Are all the Impact Assessments available for public view?

Scotland, already self sufficient in renewable energy, has to have land turbines switched off, as the energy produced by them exceeds the capability of the existing infrastructure. And the companies who own the wind farms are paid for the turbines not to turn!! It's a shameful disgrace.
No, Scotland would definitely not benefit, and consumers will pay the cost by being presented with even higher energy bills!
Energy being a reserved matter!!

This project has to be stopped.

Help us, not hinder us, in preserving the wonder and beauty of our, of Scotland's, holy land and sacred seascapes.

This MachairWind project is not needed and not wanted.
Please, as responsible people, do not let this travesty proceed.

Your sincerely
[Redacted]

Member of the Public 4952

From: [Redacted]
To: MD Marine Renewables
Subject: Machair Windfarm, Islay, Colonsay,
Date: 12 August 2026 09:33:14

To Whom it May Concern,

I wish to lodge a strong objection against the proposed Off Shore Windfarm.
For the past 18 months or so, I have examined carefully all pros for the development circulated by SSE and the arguments opposing it.
The valid facts presented by people against the development I consider extremely well researched, without any corporate spin and therefore I have no hesitation in joining forces with my fellow islanders to strive to prevent the industrialization of a unique, pristine environment.

[Redacted]

Member of the Public 4953

[Redacted]

July 13th, 2026.

Dear Sir/Madam,

We are writing to you as Mull residents wishing to express our unequivocal objection to the Scottish Power Renewables Machair Offshore Application.

Whilst we do support the transition to green energy, the massive scale of up to 144 turbines, standing 260 - 338 metres tall, is fundamentally incompatible with the pristine, globally recognised coastal environment.

Businesses on the Ross of Mull and Iona rely heavily on the island's global reputation for untouched wilderness-based ecotourism. Visitors travel here to experience ''unspoiled'' skylines and wild coastlines. The impact on industrialising these horizons may well deter the high-value, nature-focused tourists who sustain our fragile seasonal economy. The full impact of this development, on tourism; does not appear to be properly considered, or quantified. SPR have confirmed that residents, businesses and tourists to Mull and Iona are not to be included in its socio-economic impact assessment.

The visual footprint of 144 fixed-bottom turbines will irreparably alter the unique maritime character of the South West of Mull and Iona. At heights of 338 metres, these structures will desecrate the visual landscape. They will disrupt the historic panoramic views from the Ross of Mull and the sensitive cultural landscape of Iona. The mandatory statutory aviation and

maritime night-lighting will eradicate the pristine ‘’dark-skies’’ status of our remote coastal area.

The proposed site for the Machair Wind Farm threatens an area globally recognised for its biodiversity. Intensive noise pollution from underwater pile-driving and seismic activity poses an existential threat to resident and migratory cetaceans, including Minke Whale, Basking Sharks and Harbour Porpoise. The Ross of Mull and its surrounding waters acts as critical foraging grounds for vulnerable sea-bird species and raptors. The cumulative collision risk from a project of this enormity is high, as is the disruption of migratory bird pathways.

Scotlands’ legally binding target to reach NET ZERO by 2045 should not come at any cost. We are struggling to comprehend the continuation to build these colossal Wind Farms when our National Grid in unable to cope. Wind Farm owners are paid a ‘’constraint payment’’ to turn the turbines off. Something is quite wrong when senior executives from Octopus Energy and EDF are telling us that we have more than enough electricity generation capacity but, need to be able to USE this capacity and not revert to fossil fuel plants as back up! Such subsidisation is costing tax payers and consumers millions annually.

Where is the economic benefit to consumers and the areas impacted? Community benefit is unknown. SPR have confirmed that they will not commit to any benefit until they have consent to proceed. What is certain, is the potential irreversible damage to our internationally significant bird and marine life as well as the irreparable damage to these ancient and humbling land and seascapes. To industrialise one of the most culturally and environmentally significant marine landscapes in Europe is nothing more than ecological and visual vandalism. This project is driven by subsidy, shareholder profit and corporate expansion. Culture is judged on how it protects areas and ideals such as these. To allow this to proceed sets a very disturbing precedence and would not be the legacy I would choose to leave future residents.

The objective of the project is clear, profit. SPR is owned by a Spanish energy giant, Iberdrola. Profits will not remain in the Hebrides. The impacts on wildlife, eco-systems, local economy and land scape appear to be secondary. There are other ways to produce green energy, in areas where impact would be less. This development is not acceptable in any shape or form.

Yours Sincerely,

[Redacted]

Member of the Public 4954

From: [Redacted]
To: MD Marine Renewables
Subject: Fwd: Objection to Machair Wind Farm
Date: 10 August 2026 07:56:17

Sent from my iPad

Begin forwarded message:

From: [Redacted]
Date: 9 August 2026 at 21:00:47 BST
To: md.marinerenewables@gov-.scot
Subject: Objection to Machair Wind Farm

I am strongly opposed to the proposed Machair Wind Farm. I would like to state upfront that in recent years l have made my living working on wind farm projects across Scotland and am a full supporter of renewables and the absolute need to achieve net zero. The current wildfires across Europe should be a wake up call if ever we needed one. However, l am not in favour of renewables built just anywhere to maximise profit. Just visit Dumfries and Galloway and see how winds farms have industrialised the landscape to the point of vandalism.

The West Coast of Scotland is a unique and World Important seascape. It is of historical and cultural significance of the highest order. In modern times it gives so much pleasure and solace to many who seek out these places to recharge, contemplate their own mortality and spirituality in an increasingly challenging world. The sunsets are truly magnificent. Sea kayaking out to and in and around Colonsay, Iona, Staffa, the Tresnish Isles (to name but a few) is truly world class. The bird life in Colonsay is rich and wonderful. Iona is just simply just a special place. The aviation lighting on the towers will alter dramatically a dark sky environment. Therefore to desecrate these areas with this proposed massive turbine development and industrialise the landscape is truly shocking. It would fundamentally change the character of this unique Atlantic landscape. It shows that Corporate greed knows no bounds. Scotland currently produces more energy than it can cope with, with wind farms actually being paid not to produce electricity, and it is understood the development is to power Wales, which itself is a net exporter.

I trust this gives a flavour of how opposed l am to this development.

[Redacted]

Sent from my iPad

Member of the Public 4955

From: [Redacted]
To: MD Marine Renewables
Subject: I strongly object to a windfarm being erected close to Iona.
Date: 29 July 2026 15:59:29

Dear Marine Renewables
My obections are based primarily on aesthetic grounds , bearing in mind the deep connection that exists between aesthetic sensitivity and healing. It ought not to be lost sight of that Iona has for centuries been a sanctuary for millions. Healing is inseparable from a peaceful and beautiful environment; millions from inner cities, children and adults, have very little exposure to natural beauty. The very idea of a monstrous windfarm visible from Iona is preposterous. Remewable energy is vital of course, but the UK has an immeasurably extensive coastline. Please find another location. Yours, [Redacted] Sent from my iPhone

Member of the Public 4956

From: [Redacted]
To: MD Marine Renewables
Subject: MachairWind Hebrides project
Date: 21 July 2026 11:32:15

Dear Sir/Madam

I wish to register my strongest objection to the location of the proposed Machair Wind farm off the island of Colonsay.

As a very frequent, and soon to become resident of Tiree, I am an avid birdwatcher. I must implore you not to site the wind farm in this fragile landscape. This small group of islands offers vital habitat and stopping point for migratory birds, being the first (and last stop) on their journeys. Collisions will decimate populations of already "at risk" birds, they will face unnecessary detours to avoid the farm adding to stress, and potentially exhaustion, and they could even seek alternative stop-over sites where the habitat could be less than ideal which would ultimately reduce their numbers too.

However, perhaps most concerning is the blatant disregard for the economic impact this will have on the small and fragile communities of the Inner Hebrides.
1. Many people visit these small islands specifically to birdwatch and these tourists are valuable contributors to the fragile economies of these small islands. If nature tourism falls away, then there is a big risk to the viability of the communities living on the islands.

2. For generations, Scotland’s west coast has been defined by vast seas, unspoilt island views, dark skies, wildlife and tranquillity — the very qualities that attract visitors and sustain the island economies. So it's not just the birdwatching tourists who will no longer visit. The blot on the beautiful landscape will deter visitors, and the islands will not be able to sustain themselves, and will not be viable without tourists.

There is no benefit for the islanders of this windfarm at all. Living on the islands comes at many costs, but the financial impact of living there can't be underestimated. Fuel costs are higher than anywhere else, and there is no plan to recompense the islanders in cheaper rates to ameliorate for the fact their income will be severely affected by fewer visitors.

Finally, I am very concerned that many windfarms I have seen are rarely entirely operational. I understand from my research that the cost of maintenance is very high and the availability of spare parts can not be guaranteed, leading to inoperable turbines when parts become obsolete. The cost of removing turbines when they have reached their useful lifespan is incredibly expensive, and many companies just choose to leave them in situ, unworking and and eyesore. There is nowhere in this plan, that I can see, where there is any plan for the removal of the farm once it has outlived its usefulness.

All in all, whilst renewable energy is vital to support the Government's plans for a greener UK, surely there must be a better location for a windfarm than the proposed MachairWind site. In my view, this plan is sheer vandalism, ill thought through, and will be excessively damaging to the very islands, their economies, their environments, and could even be the final straw for very fragile communities who could find themselves no longer able to sustain themselves.

Yours Faithfully
[Redacted]

Member of the Public 4957

From:	[Redacte
To:	MD Marine Renewables
Subject:	Objection to the Planning Application for MachairWind Offshore Wind Farm
Date:	22 July 2026 18:48:41

Dear Sir / Madam,

I am writing to formally object to the planning application for the MachairWind Offshore Wind Farm.

In my view, the Environmental Impact Assessment (EIA) does not yet provide a sufficiently robust basis for determining the application. Several potentially significant environmental, social, economic, and infrastructure-related effects remain either inadequately assessed, subject to substantial uncertainty, or omitted altogether. Accordingly, further assessment and clarification should be required before consent is considered.

The principal concerns can be summarised as follows:

- Incomplete assessment of cumulative and indirect impacts, including interactions with associated grid infrastructure and other developments.
- Insufficient consideration of emerging environmental risks, including effects on marine ecosystems, phytoplankton productivity, underwater sound, moving underwater shadows, corrosion protection systems, and turbine blade erosion.
- Limited assessment of infrastructure resilience, security risks, and the protection of critical offshore energy assets.
- Uncertainty surrounding decommissioning obligations, residual seabed infrastructure, waste management, and financial security arrangements.
- Inadequate consideration of landscape, seascape, tranquillity, wellbeing, and associated social impacts.

The application documentation also raises broader concerns regarding environmental governance, marine ecosystem protection, physical and coastal processes, economic viability, community impacts, and the long-term sustainability of the project. In several instances, potentially significant impact pathways appear to have been scoped out without sufficient justification or are addressed only at a high level despite acknowledged scientific uncertainty.

Given the scale and complexity of the proposed development, together with the cumulative nature of its potential effects, a more precautionary and comprehensive assessment is warranted. In particular, further information should be provided regarding ecosystem impacts, infrastructure security, offshore wind wake effects, decommissioning liabilities, and the full economic and social implications of both the offshore and associated onshore components. As well as the impact on those seeking spiritual solace on one of our most sacred uk sites.

For these reasons, I respectfully submit that consent should not be granted on the basis of the information currently available. The applicant should instead be required to provide further evidence and assessment to address the issues identified above before the proposal is taken forward.

Thank you for your consideration of this objection.

Sent from Outlook for Android

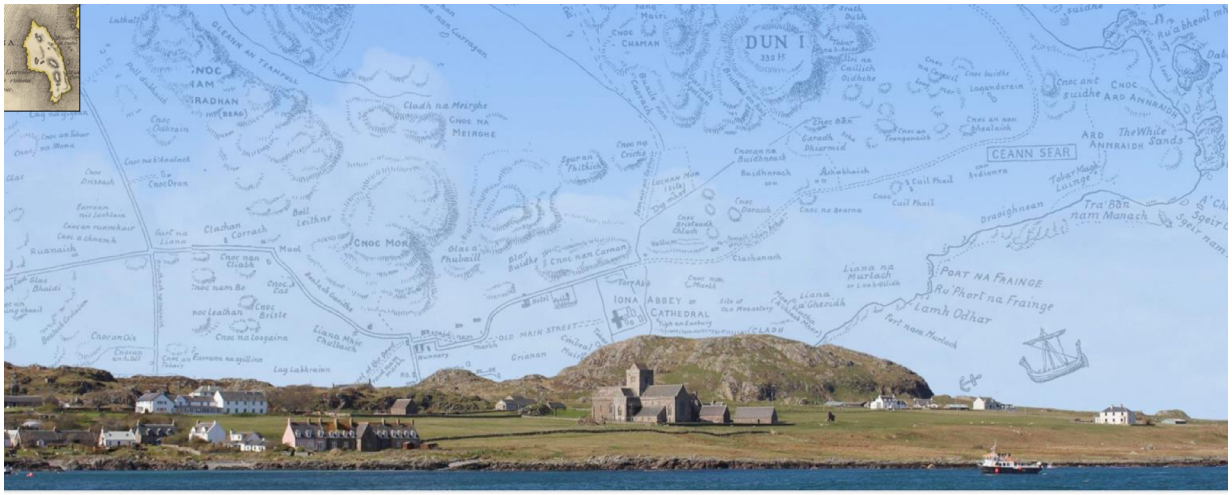
Member of the Public 4958

From: [Redacted]
To: MD Marine Renewables
Date: 04 August 2026 14:31:16

MachairWindfarm.
I wish to object in the strongest possible terms to this development. I agree with the cogent arguments put forward by ICC.
[Redacted]

Sent from Outlook for Android

Member of the Public 4959



Ainm-thìr Idhe
Ainmean-àite agus an dinimigeachd ann an Ì agus a h-àrainn

Iona's Namescape
Place-names and their dynamics in Iona and its environs

Scan to access our interactive map

To: MD.MarineRenewables@gov.scot

Objection to the proposed MachairWind Offshore Wind Farm, Section 36 application reference 00012385 and marine licence application reference 00012386, associated case reference ECU00004704, submitted by MachairWind Limited (ScottishPower Renewables).

We are writing on behalf of the research team for the project "Iona's Namescape: place-names and their dynamism in Iona and its environs", based at the University of Glasgow. This project was deeply concerned with the intangible heritage of Iona and surrounding islands, particularly with place-names, but also with how the local community, and other communities of visitors and users, have interacted with Iona and its surroundings for many hundreds of years. Our perspective comes from history and heritage, but also intersects with the needs of tourism, faith communities and others. The importance of **place** here stands out. Iona is a significant place in the world, and the essence of that place includes the surrounding landscape and seascape.

The MachairWind development should be rejected. It is in the wrong place, and the developers have paid insufficient attention to the detrimental effect that loss of the seascape and vistas will have on various of the surroundings islands. This has partly come about by the failure to take account of communities beyond a certain very restricted proximity or classification. People come to live in the Inner Hebrides because of that seascape. Tourists come to the island because of the seascape. The proposal would destroy the vistas which are such a unique and powerful part of people's experience of living and visiting these islands, and in particular Iona.

The islands have a rich and deep history, nowhere more than Iona itself, but part of that history is its long-term relationship to the sea, and to the sea-paths through the Hebrides to Ireland. Historically, the monks of Iona thought of themselves as living on the edge of

the world, and the surrounding seascape allows the visitor re-inhabit that world—we know this is something that they deeply value. The proposed development would sever that link, creating industrial development where no such development has previously been, and irreparably changing what the residents of and visitors to many of the local islands see on a daily basis. It would obliterate the landscape which defined Iona's meaning for a millennium. This is not trivial.

There is no corresponding benefit for any of these communities. They will not get jobs (or if they do, they will be temporary and few in number), and they will not receive the electricity generated by the windfarm, which in any case currently does not have the capacity to connect to the grid as proposed. These islands have already heavily invested in green energy solutions at a local level, and so local communities are already contributing their fair share to Scotland’s push for net zero. It is not clear why they should bear the burden of this new, and as other submissions have made clear, unnecessary development. We object strongly to it, and urge that the permission be rejected.

In these brief comments, we fully support and endorse the more detailed objections, which make clearer and in more precise detail than we are able to here, the failure of the applicant to provide adequate information on the impact of the proposed windfarm, which you will have received from other organisations, such as Iona Community Council, The Iona Community, Visit Mull & Iona, and many others.

Yours sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

and on behalf of the Iona’s Namescape research team:

[Redacted]

Member of the Public 4960

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Machair Wind (Scotwind WI)
Date:	13 August 2026 21:56:32

As a resident of the Isle of Iona, I write to register representations regarding the above application for consent to construct a large offshore windfarm off the West Coast of Scotland, located to the South of Mull and Iona nearer the shores of Colonsay, Jura and Islay.

I have battled to be able to picture what this might look like and therefore it is difficult to get a handle on the possible visual impact. What I do know however is that parts of Iona, looking South down the Sound of Iona towards the above mentioned islands, is designated an Area of Panoramic Quality - which panorama is going to be changed if this development goes ahead.
I am not even necessarily opposed, as a point of principle, to the aesthetics of wind turbines. However, what is being proposed does seem to be unnecessarily vast - somewhere in the region of 100 turbines of a height that equal to the highest currently operating anywhere in the world - to develop something on that scale isn't just a small alteration to our seascape, our skyline, our horizon - which is currently virtually empty of manmade structures save for one, considerably smaller, lighthouse - but represents a vast industrialisation of one of our most unchanged landscapes.

What seems more ludicrous however, is the suggestion that we might not even be able to usefully harness and utilise the wind generated in such a development. I am pro-renewables and assumed that all green developments should be allowed to proceed - I don't even mind the lack of local benefit as I stood by the global benefit. However, I keep coming across examples of the UK *already* producing more wind than it can use - either because our energy needs our lower than predicted, or because the wind power is being generated in a place too remote from where the energy is needed or because the grid infrastructure cannot cope with the amount of energy being created. I understand that, in some instances, wind farms receive money to, effectively, switch off.
It seems insane to me that any more money, some of which I understand will come from government subsidy - taxpayers money - to develop more wind farms, when the grid already cannot cope with the wind farms we already have. Surely that money would be better spent on improving the grid infrastructure first - once that is robust, then further developments could be usefully considered. It is even more insane when you consider this development - which may actually be redundant if its power cannot usefully be harnessed by the grid - would be placed in an otherwise natural seascape.

Kind Regards
[Redacted]

Isle of Iona.

Member of the Public 4961

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to MachairWind Offshore Wind Farm – Reference: MD-00012385/ MD-00012386
Date: 28 June 2026 10:59:53

I object to MachairWind Offshore Wind Farm – Reference: MD-00012385/ MD-00012386 on three main grounds.

Firstly, the electricity generated by existing Scottish wind farms is too great for the grid infrastructure, and the wind farm operators have to be paid to not generate power. This new wind farm will exacerbate that problem.

Secondly, the location is environmentally sensitive, and the construction will be detrimental and destructive.

Thirdly, there are no plans for decommissioning after the ludicrously short operating period of 35 years.

The emphasis should be on making use of existing wind farms, not adding any more.

[Redacted]

Member of the Public 4962

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Marchair Wind Farm
Date:	31 July 2026 16:46:22

Machair Wind Farm

Subject: Representation Objecting to the MachairWind Offshore Wind Farm

Dear Sir/Madam,

I am writing to object to the proposed MachairWind Offshore Wind Farm application.

I am a permanent resident of the Isle of Tiree. My home is situated on the south-east coast of the island, and the proposed wind farm would be visible from my property and from many locations that I use regularly. My objection is based on the significant and lasting impacts that this development would have on the landscape, seascape, natural environment and the communities that depend upon them.

My principal concerns are as follows:

1. Significant visual and seascape impact

The waters surrounding Tiree, Mull, Iona and the wider Inner Hebrides are recognised for their exceptional natural beauty and sense of openness. The introduction of a very large offshore wind farm would fundamentally alter the character of these seascapes.

The uninterrupted views across the Atlantic are one of the defining features of Tiree. The proposed development would industrialise what is currently a largely natural horizon, reducing the sense of remoteness and tranquillity that residents and visitors alike value.

As someone who would see the development from my own home, this represents a substantial and permanent change to the environment in which I live.

1. Impact on landscape character and scenic value

The landscapes and coastlines of the Hebrides are internationally recognised for their outstanding scenic qualities. The cumulative effect of hundreds of turbines, aviation lighting and associated offshore infrastructure would diminish the unique landscape character that attracts visitors from around the world.

Once this character is lost, it cannot realistically be restored.

1. Impact on tourism

Tourism is one of the principal economic drivers for Tiree and neighbouring islands. Many visitors come specifically for the unspoilt scenery, wide horizons, dark skies, wildlife and feeling of escape from industrial development.

There is a genuine risk that the industrialisation of the surrounding seascape could damage Tiree’s reputation as a destination for nature-based and landscape tourism, with consequential effects on local businesses, accommodation providers, restaurants, outdoor activity providers and the wider island economy.

1. Wildlife and marine environment

The waters surrounding Tiree support internationally important populations of seabirds, marine mammals and other protected species. I remain concerned about the potential effects of the construction and operation of such a large development, including underwater noise, habitat disturbance, increased vessel movements and collision risks for birds.

Given the ecological importance of this area, I believe the precautionary principle should be applied where there

remains uncertainty over long-term impacts.

1. Cumulative impacts

This proposal should not be considered in isolation. Scotland's west coast is facing multiple offshore renewable developments, and their combined effects on landscapes, wildlife, navigation and coastal communities could be substantially greater than the impact of any one project alone.

I am concerned that cumulative impacts have not been given sufficient weight.

1. Effects on local communities

Island communities such as Tiree rely heavily upon their natural environment for their quality of life, wellbeing and economic sustainability. Residents who experience the visual impacts every day will bear the long-term consequences of this development while receiving relatively limited direct benefit.

I believe the interests of communities living closest to the development deserve significant consideration.

1. Dark skies and night-time impacts

The Hebrides are valued for their exceptionally dark skies. The aviation warning lights required on offshore turbines have the potential to introduce significant light pollution into an area where darkness forms an important part of the natural environment.

1. Irreversible change

While I recognise the importance of renewable energy in addressing climate change, I do not believe every location is suitable for industrial-scale development. The west coast of Scotland contains some of the country's most iconic and least disturbed coastal landscapes. Once transformed by a development of this scale, these landscapes cannot be returned to their previous condition.

Renewable energy should be developed in locations where environmental and community impacts are minimised. In my view, this proposal fails to achieve an appropriate balance between the need for renewable generation and the protection of nationally important landscapes and island communities.

For these reasons, I respectfully request that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm application.

Thank you for considering my representation.

Yours faithfully,

[Redacted]

Member of the Public 4963

From:	[Redact
To:	MD Marine Renewables
Subject:	FORMAL OBJECTION TO SECTION 36 & MARINE LICENCE APPLICATION FOR MACHAIRWIND OFFSHORE WIND FARM
Date:	22 July 2026 12:02:16

Application Reference: MD-00012385 / MD-00012386

Dear Sir / Madam,

I am writing to formally object to the planning application for the MachairWind Offshore Wind Farm.

The submitted Environmental Impact Assessment (EIA) fails to fully evaluate the likely significant effects of the Proposed Development on the marine environment, physical ocean processes, critical infrastructure security, human health, and coastal community wellbeing.

Due to material information gaps, unassessed impact pathways, and cumulative uncertainties, the application does not provide a robust basis for determination under Scottish planning policy and EIA requirements. Consent should be refused until the following critical matters are addressed:

1. **Infrastructure Security & Defense:** Covers ~448 km² and up to 844 km of subsea cables within an MOD training area. The EIA acknowledges malicious acts but fails to assess physical/digital resilience against deliberate interference, a critical oversight given heightened geopolitical security concerns surrounding UK energy infrastructure.

2. **Displaced UXO Risks to Human Safety:** While the EIA notes unexploded ordnance (UXO) risks on-site, it fails to evaluate whether the displacement of commercial fishing effort will expose mariners to UXO hazards in adjacent sea areas.

3. **Phytoplankton Productivity & Marine Carbon Cycling:** Despite known regional plankton declines, no baseline characterization or ecosystem-scale modeling was conducted to assess how changes in turbulence, light, and stratification from 340m tall turbines will impact primary production and climate regulation.

4. **Leading-Edge Erosion & Microplastic Release:** Higher wind speeds and winter rainfall on Scotland's west coast accelerate blade coating degradation. The EIA omits assessment of potential microplastic pollution, reduced aerodynamic efficiency, and shortened operational lifespans over 35 years.

5. **Pollution from Corrosion Protection:** The EIA omits details on cathodic protection systems and fails to quantify trace metal releases or consider non-polluting mitigation alternatives over the project's lifecycle.

6. **Infrasound & Long-Distance Marine Ecological Impacts:** While predicting Permanent Threshold Shift (PTS) in low-frequency cetaceans (e.g., minke whales) up to 27 km away, the EIA fails to assess broader population-level ecological consequences or low-frequency sound impacts on fish and invertebrates.

7. **Moving Underwater Shadows:** Lensing by surface waves can intensify moving blade shadow contrast underwater. This impact pathway on migratory species (such as Atlantic salmon) was improperly scoped out without evidence.

8. **Coupled Atmospheric-Oceanic Modeling Deficits:** The hydrodynamic modeling ignores the turbine array's wake effects on local wind fields, excluding a key driver of air-sea exchange, mixing, and coastal processes.

9. **Wind Wake ("Wind Theft") Interactions:** The EIA ignores downstream wind wake impacts (extending over 100 km) on neighboring consented or proposed developments (e.g., Malin Sea Wind, Kintyre onshore wind), contrary to UK "good neighbour" guidance.

10. **Incomplete Project Assessment & Socio-Economic Harm:** The EIA assesses the wind farm in isolation, omitting the onshore transmission infrastructure to South Ayrshire. Unassessed grid connection costs, compounded by high local transmission charges - threaten project viability. Furthermore, 97% of local households in Iona oppose the scheme; the EIA ignores the serious mental health, cultural, and community cohesion impacts caused by industrializing iconic seascapes.

11. **Decommissioning Liabilities & Circular Economy Gaps:** The EIA lacks clarity on residual seabed infrastructure, provides no circular economy strategy for recycling composite blades, and fails to demonstrate secure, ring-fenced financial provisioning for future site restoration.

Conclusion

Given the scale, environmental complexity, and material gaps within the EIA, the current documentation is insufficient to support an informed, precautionary determination. I respectfully request that Scottish Ministers refuse consent in its current form and require the Applicant to provide comprehensive supplementary assessments.

Yours sincerely,

[Redacted]

Member of the Public 4964

[Redacted]

[Redacted]

Date: 20 July 2026

To: Scottish Ministers (Marine Scotland – Marine Directorate) MD.MarineRenewables@gov.scot

Subject: Objection to the Planning Application for MachairWind Offshore Wind Farm

Dear Sir / Madam,

I am writing to formally object to the planning application for the MachairWind Offshore Wind Farm.

It is considered that the Environmental Impact Assessment (EIA) does not fully assess the likely significant effects of the Proposed Development on the marine environment, human health, and coastal communities. As outlined in the following sections, key gaps in the assessment, combined with scientific uncertainty and unquantified cumulative impacts, mean that the application does not yet provide a sufficiently robust basis for determination in accordance with Scottish planning and EIA requirements. Further assessment and mitigation are therefore required before consent can be granted.

Summary of Key Concerns

The principal matters requiring further consideration before determination of the application are summarised below:

- Incomplete assessment of cumulative and indirect impacts, including interactions between offshore infrastructure, grid connection requirements and other existing or planned developments.
- Insufficient consideration of emerging environmental risks, including potential effects on marine ecosystems, phytoplankton productivity, underwater sound, moving underwater shadows, corrosion protection systems and turbine blade erosion.
- Limited assessment of infrastructure resilience, security risks and the protection of critical offshore energy assets.
- Uncertainty regarding decommissioning requirements, residual seabed infrastructure, waste management and financial security.
- Inadequate assessment of landscape, seascape, tranquillity and associated health and wellbeing effects.

The following sections provide further detail on each of these matters, including the specific information gaps, uncertainties and potential impacts identified within the application documentation. They are presented to assist the decision-maker in assessing whether the EIA provides a sufficiently robust basis for determining the Proposed Development.

Evolving Environmental Governance

The concept of granting legal personhood to the ocean and other natural systems has received increasing attention in academic and policy literature and has been implemented in several jurisdictions worldwide [1]. In Scotland, the marine environment has also been afforded institutional representation through the appointment of an Ocean Representative to the Board of the Scottish Association for Marine Science (SAMS) [2].

These developments reflect a broader evolution in environmental governance, recognising that the marine environment has intrinsic value alongside its economic and societal importance. They also illustrate the need for environmental assessments of major marine developments to remain robust, precautionary and capable of addressing evolving scientific understanding and societal expectations regarding the protection of marine ecosystems.

Infrastructure Security and Resilience

The Proposed Development covers approximately 448 km^2 and includes up to 844 km of subsea cables located at least 12.4 km offshore [3]. Its offshore location, extensive footprint and associated electrical and digital infrastructure mean that it forms part of an increasingly important category of critical national infrastructure. It also lies within a military exercise and training area used by the Ministry of Defence [4].

The EIA identifies malicious acts as a potential hazard [5] but does not assess the Proposed Development's vulnerability or resilience to deliberate interference with offshore infrastructure. Recent incidents involving Russian intelligence vessels operating in UK waters, including near northern Scotland, have highlighted growing concerns regarding the security of offshore energy assets and subsea infrastructure [6,7]. These developments demonstrate that such risks are no longer solely theoretical.

The publicly available application documents also provide little information regarding the security assurance of critical hardware, supply chains, digital systems or communications infrastructure. Given recent Government scrutiny of security risks associated with components supplied by certain overseas manufacturers, together with the decision to prevent Ming Yang from establishing a wind turbine manufacturing facility in the Highlands [8], greater transparency regarding supplier assurance and the protection of critical systems would assist the Planning Authority and Scottish Ministers in understanding the resilience of the Proposed Development.

In view of the strategic importance of offshore renewable energy infrastructure, it is submitted that the Applicant should clarify whether these matters have been assessed and explain how the resilience of the Proposed Development to external disruption has been considered**.**

Unexploded Ordnance on the Seabed

Large quantities of unexploded ordnance (UXO) remain on the seabed in UK and European waters, posing recognised risks to marine users during offshore development activities. The EIA assesses the potential presence of UXO within the Windfarm Development Area and Export Cable Corridor based on historical military activity and identifies the associated risks [3].

The EIA also acknowledges that the Proposed Development may displace commercial fishing activity. However, it does not consider whether such displacement could increase fishermen's exposure to UXO hazards in surrounding areas, as has been reported in the Firth of Forth [9].

This represents a gap in the assessment of human safety, as risks associated with displaced activities may extend beyond the boundaries of the Proposed Development.

If commercial fishing or other marine activities are displaced, the associated UXO risks may likewise be displaced. The assessment should therefore extend to consider areas into which fishing effort and other marine users may relocate, ensuring that the potential human safety implications of activity displacement are fully evaluated.

Impact on Phytoplankton Growth and Primary Production

Phytoplankton form the foundation of the marine food web and play a vital role in oxygen production and the uptake of atmospheric carbon dioxide (CO_2). Although essential to healthy marine ecosystems, excessive phytoplankton growth can also contribute to harmful algal blooms [1]. Offshore wind farms may influence phytoplankton productivity through multiple pathways, including changes to turbulence, stratification, sediment resuspension and nutrient availability, with the potential to both enhance and reduce primary production at local and regional scales [1,10,11].

Recent research indicates that plankton abundance across the Northeast Atlantic is in decline, with shelf habitats in the Celtic Seas identified as being in particularly poor condition [12]. This underlines the importance of understanding any additional pressures of the Proposed Development on primary production within the wider marine ecosystem.

The EIA acknowledges that the Proposed Development may alter turbidity, sediment transport, water-column stratification and vertical mixing. However, these physical changes are assessed only indirectly in relation to phytoplankton, and no modelling is presented to evaluate how changes in light availability, nutrient dynamics or mixing may influence phytoplankton productivity or primary production at an ecosystem scale [13].

The Applicant states that the Proposed Development will make a significant contribution towards Scotland's and the UK's Net Zero objectives, with estimated annual carbon savings of millions of tonnes of CO_2 [14]. In this context, it is notable that the EIA does not include a baseline characterisation of phytoplankton productivity or an assessment of how the Proposed Development may affect this fundamental component of marine carbon cycling and ecosystem functioning.

Given the scale of the Proposed Development and the recognised importance of phytoplankton to both biodiversity and climate regulation, this omission represents a material gap in the assessment. A more robust evaluation of potential effects on phytoplankton productivity and the wider ecosystem should therefore be provided before the application is determined.

Leading-Edge Erosion of Turbine Blades

Leading-edge erosion, caused by the repeated impact of raindrops and airborne particles on turbine blade coatings, becomes increasingly significant as blade lengths and tip speeds increase [1]. With a proposed rotor diameter of up to 290 m [15], the Proposed Development is likely to experience substantial leading-edge erosion during its operational lifetime [16].

Leading-edge erosion has both environmental and operational implications. Degradation of blade coatings can result in the release of microplastic particles to the marine environment, while also reducing aerodynamic efficiency, increasing maintenance requirements and shortening turbine blade lifespan.

Research has shown that the higher wind speeds and precipitation experienced in the northeastern North Sea accelerate coating degradation, reducing blade lifetimes by approximately 20% compared with the southwestern North Sea [16]. As the west coast of northern Scotland is more exposed to rain-bearing westerly winds during winter storms than the North Sea [17], erosion rates may be greater still for the Proposed Development. Given the anticipated 35 years of operational lifetime of the wind farm [3], even relatively small annual losses of blade coating material could result in substantial cumulative releases of microplastics over the lifetime of the project.

Despite these considerations, the publicly available planning documents do not include a specific assessment of leading-edge erosion or its potential consequences, including microplastic emissions, reduced turbine efficiency, increased maintenance vessel traffic and shortened turbine lifespan. These matters are relevant to both the environmental effects and long-term operational performance of the Proposed Development, yet they are not explicitly considered within the EIA. The Applicant should therefore demonstrate how leading-edge erosion has been considered and assess its likely environmental and operational implications over the lifetime of the project.

Pollution from Corrosion Protection Systems

Corrosion protection systems are required to prevent the degradation of offshore wind turbine foundations and associated steel structures, both above and below the waterline. Sacrificial anodes and other cathodic protection systems can release trace metals into the marine environment throughout the operational life of a wind farm, with the potential for cumulative environmental effects [1,18].

Despite the widespread use of these systems in offshore wind developments, the EIA does not assess the potential environmental impacts of trace metal emissions from corrosion protection, nor does it describe the corrosion protection methods proposed for the Proposed Development. It also does not consider whether alternative corrosion protection strategies or mitigation measures, such as those proposed by Watson *et al*. [19], could reduce trace metal inputs to the marine environment.

Given the scale and anticipated operational lifetime of the Proposed Development, the omission of this assessment represents a material gap in the EIA. The Applicant should therefore provide details of the proposed corrosion protection systems, estimate the likely quantities of trace metals released over the lifetime of the project, and assess the effectiveness of available mitigation measures before consent is granted.

Underwater Infrasound

The inclusion of infrasound within the Applicant's underwater noise modelling is a positive aspect of the EIA [20], as frequencies this low are not routinely considered in offshore wind assessments. Infrasound, defined as sound below 20 Hz and below the threshold of human hearing, can propagate over hundreds of kilometres in the marine environment [21] and therefore has the potential to extend well beyond the Offshore Development Area.

Many marine organisms, including low-frequency hearing cetaceans, teleost fish and marine invertebrates such as cephalopods and jellyfish, rely on sound within this frequency range for essential biological functions, including navigation, foraging, communication, reproduction and predator avoidance [21].

The underwater noise modelling identifies impact piling as the activity with the greatest potential to cause injury, predicting the onset of Permanent Threshold Shift (PTS), that is irreversible hearing damage, in low-frequency cetaceans, including minke whale, over distances of up to 27 km. The predicted impact range is estimated to reduce to approximately 2.1 km with mitigation measures such as bubble curtains [20].

While the EIA appropriately identifies PTS as a form of physical injury, it does not adequately assess the ecological consequences of permanent hearing impairment beyond the individual animal. In particular, the assessment does not evaluate how irreversible hearing loss could affect survival, foraging success, navigation, reproductive success or population dynamics in vulnerable cetacean populations.

In addition, the assessment gives limited consideration to uncertainties regarding the sensitivity of other marine taxa to low-frequency sound [21]. Given these uncertainties, and the distances over which infrasound can propagate, the ecological implications of underwater infrasound warrant a more comprehensive assessment before the application is determined.

Moving Underwater Shadows

The potential effects of visual stimuli generated by offshore wind turbines on aquatic species remain poorly understood, and the underlying physical processes are still being investigated. Recent research indicates that, contrary to assumptions commonly applied in offshore wind EIAs, lensing by surface waves can intensify rather than attenuate the contrast of turbine blade shadows penetrating the water column [1].

The Windfarm Development Area may intersect migratory routes used by species such as Atlantic salmon. However, the marine ecology chapters do not consider whether moving subsurface shadows or other visual stimuli generated by rotating turbine blades could influence the behaviour of fish, marine mammals or other visually sensitive marine species [22]. Nor does the EIA provide a clear justification for scoping this potential impact pathway out of the assessment.

Although the ecological significance of these visual effects remains uncertain, scientific uncertainty alone does not justify their exclusion from assessment where a plausible mechanism has been identified. In the absence of a robust evidence base demonstrating negligible effects, the omission of this pathway introduces uncertainty into the assessment of ecological impacts.

The Applicant should therefore justify the decision to scope out moving underwater shadows and associated visual stimuli or, alternatively, provide an assessment of their potential effects on relevant marine receptors informed by the current state of scientific knowledge. Given the recognised uncertainty surrounding this emerging field of research, a precautionary approach should be adopted to ensure that potentially significant effects on fish, shellfish and marine mammal receptors have been adequately considered before the application is determined.

Changes to Physical and Coastal Processes

The EIA assesses the effects of the Proposed Development on the marine physical environment using MIKE hydrodynamic models. These models simulate turbine–water interactions, including the influence of fixed foundation structures on waves and currents, such as the blocking effect of monopile foundations on wave propagation [23].

On this basis, the EIA concludes that the Proposed Development would result in no more than minor adverse effects (not significant in EIA terms) on physical and coastal processes [3].

However, the modelling does not account for the influence of the wind farm on near-surface wind fields. Large offshore wind arrays are known to modify wind speed and turbulence through wake effects, with changes extending over considerable distances downstream. These atmospheric changes can influence air–sea exchange processes, including wind stress, wave generation, vertical mixing and stratification, with potential consequences for sediment transport, primary production and bottom-water deoxygenation beyond the Windfarm Development Area and the Zone of Influence considered in the EIA [11,24,25].

The modelling therefore assumes that the Proposed Development alters the marine environment only through direct turbine–water interactions and does not modify the atmospheric forcing that drives the marine system [23]. This represents an important limitation of the assessment, as it excludes a plausible impact pathway that could influence both the magnitude and spatial extent of environmental change.

The Applicant should therefore explicitly acknowledge and justify this modelling assumption and explain why the omission of wind-farm-induced atmospheric effects does not affect the conclusions of the EIA. In the absence of such justification, the conclusions regarding physical and coastal processes remain subject to significant uncertainty.

Wind Wake Effects on Neighbouring Wind Farms

The submitted application does not assess the potential aerodynamic interactions between the Proposed Development and existing or planned wind farms. It is well established that wakes generated by large offshore wind arrays can extend for more than 100 km downstream, reducing wind speeds and potentially decreasing the energy yield of neighbouring wind farms by several tens of percent under certain atmospheric conditions [1,26]. These interactions, commonly referred to as wind wake effects or "wind theft", may therefore have material operational and economic consequences for other renewable energy developments.

There is potential for wake interactions between the Proposed Development and nearby offshore developments, such as the planned Malin Sea Wind floating offshore wind farm [27], as well as onshore wind farms located downwind of the prevailing south-westerly winds [17], including developments on the Kintyre peninsula [28]. Despite this, the EIA does not assess the potential extent or significance of these cumulative interactions.

The omission is particularly noteworthy given that the UK Government promotes a "good neighbour" approach. Their guidance states that developers of incoming offshore wind farms are strongly encouraged to undertake a wake assessment to understand the impact of their development on nearby offshore wind farms [29]. Despite this, the Applicant has not assessed the potential for wake interactions with neighbouring offshore or onshore wind developments. In this context, the absence of any assessment of wind wake effects represents a material gap in the information supporting the application.

The Applicant should therefore assess the potential for wind wake interactions with existing, consented and reasonably foreseeable offshore and onshore wind energy developments, and demonstrate that any material operational or economic effects have been appropriately considered before the application is determined.

Economic and Social Impacts

The economic viability of the Proposed Development warrants further scrutiny. Work on the West of Orkney Wind Farm has reportedly been paused due to the exceptionally high cost of grid connection, with transmission charges identified as among the highest in northern Scotland [30]. This raises legitimate questions regarding the financial viability of comparable offshore wind developments requiring similar new transmission infrastructure, including the Proposed Development, which is anticipated to connect to the grid in South Ayrshire [3]. These uncertainties should also be considered alongside the significant system constraint costs associated with integrating offshore wind generation in northern Scotland [1].

The Applicant acknowledges that there is currently insufficient information regarding the grid connection and associated onshore transmission infrastructure to enable an assessment of the combined effects of the offshore and onshore elements of the project. Consequently, the EIA does not assess the Proposed Development as a complete project [14]. As a result, the full economic and social implications arising from the associated transmission infrastructure have not been evaluated within the current application.

According to Iona Community Council, despite nearly two years of interaction with the developer, it has been difficult to obtain a clear picture of the scale, impacts, costs and benefits of the Proposed Development [31]. Their consultation with the island community on the Proposed Development revealed that only 3% of the consulted households supports the proposal. Contemplation should also be given to the potential effects on community wellbeing and social cohesion where major developments give rise to sustained community conflict or division [32].

In light of these matters, it is considered that the Application does not provide a sufficiently comprehensive assessment of the economic and social implications of the Proposed Development. A more detailed evaluation of economic viability, cumulative costs, and the social impacts associated with both the offshore and onshore components should be undertaken before any decision on consent is made.

Decommissioning

Environmental Impacts and Sustainability

The EIA states that structures above the seabed will be removed at the end of the operational life of the Proposed Development but provides limited clarity regarding the extent of infrastructure that will remain in situ [33]. The Proposed Development includes three potential foundation types which differ significantly in their seabed penetration depths and physical footprints [33]. However, the EIA does not clearly identify the extent to which these substructures, or associated infrastructure, would be removed during decommissioning.

Similarly, the long-term management of associated components, including corrosion protection systems attached to steel structures, is not adequately addressed. Where partial removal of foundations is proposed, substantial infrastructure may remain embedded within the seabed for the foreseeable future, with potentially significant long-term environmental implications. In the absence of detailed assessment, the residual effects of such an approach remain uncertain.

The EIA also provides no clear strategy for the management of turbine blades at the end of their operational life.

Turbine blades are manufactured from composite materials that are widely recognised as being difficult to recycle, with landfill disposal and incineration representing a significant end-of-life pathway [34].

The absence of a defined decommissioning and waste management strategy creates uncertainty regarding the long-term environmental effects of the Proposed Development. This approach appears inconsistent with the principles of the waste hierarchy established under the Waste (Scotland) Regulations 2012 [35], which require priority to be given to waste prevention, reuse, recycling and recovery before disposal, and with Scotland's wider circular economy objectives.

Accordingly, the Planning Authority and Scottish Ministers are respectfully requested to consider whether the proposed decommissioning strategy has been assessed in sufficient detail. Clarification should be required regarding the extent of infrastructure proposed to remain in situ, the environmental consequences of partial removal, and the Applicant's strategy for managing turbine blades and other difficult-to-recycle materials in accordance with circular economy principles before any consent is granted.

Financial Liabilities

The adequacy of financial provision for decommissioning also requires careful consideration. Research undertaken by the Netherlands Organisation for Applied Scientific Research (TNO) indicates that decommissioning costs for a 2 GW offshore wind farm could be approximately €100 million higher than previous estimates [36]. Although partial removal of infrastructure may reduce costs, this approach may not necessarily represent the most environmentally appropriate option and should not be adopted solely based on financial considerations.

There is also increasing concern regarding decommissioning liabilities across the UK offshore wind sector. Evidence suggests that some operators may not be making financial provision in accordance with Government expectations for meeting end-of-life obligations, creating a potential risk that future decommissioning liabilities could ultimately fall upon the public purse [37].

Reflecting on these uncertainties, it is respectfully submitted that any consent granted for the Proposed Development should be subject to robust planning conditions or legally enforceable obligations requiring the Applicant to establish, maintain and periodically review ring-fenced financial security sufficient to meet the full costs of decommissioning and site restoration. Such financial security should remain in place throughout the operational life of the project and be secured well in advance of the expiry of any subsidy support or anticipated decommissioning period.

Mental Health and Wellbeing

Uninterrupted vistas, expansive open spaces, long views to the horizon, and dark night skies are widely recognised as contributing to health and wellbeing by providing emotional, psychological and physical benefits. These benefits are particularly associated with landscapes and seascapes that remain unspoilt, tranquil, and relatively free from large-scale development [1].

Scotland's west coast and the Hebridean islands are renowned for their scenic beauty, remoteness and tranquillity, attracting residents and visitors seeking recreation, reflection and respite.

For over 1,400 years, Iona and the surrounding islands have welcomed Christian pilgrims and today continue to attract people of many faiths and none seeking spiritual renewal, contemplation and wellbeing [38]. The introduction of a large-scale industrial development would erode the remoteness and tranquillity that underpin the area's cultural, spiritual and recreational significance.

The EIA identifies significant visual effects from viewpoints on Colonsay, Oronsay, Islay, Jura, Mull and Iona, together with effects on sections of the Argyll coastline and ferry routes. It also recognises adverse effects on landscape character, coastal character and recognised landscape qualities [39].

However, despite acknowledging these significant changes to the landscape and seascape, and their effects on tourism, the EIA does not evaluate the potential implications for mental wellbeing, sense of place, or the emotional and cultural connections that individuals and communities have with valued landscapes and seascapes [40], for example as presented by the cultural initiative *Hebridean Horizons* [41].

Scottish Planning Policy recognises that the quality and character of Scotland's landscapes contribute to community health and wellbeing [42]. These are material planning considerations where significant changes to valued landscapes are proposed. In addition to the physical environmental effects identified in the EIA, the Planning Authority and Scottish Ministers are respectfully requested to consider the cumulative effects of the Proposed Development, including both its offshore and onshore components, on landscape and seascape, the wellbeing benefits they provide, and the sense of place experienced by residents and visitors.

Concluding Remarks

The matters set out above indicate that the publicly available project documentation does 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 adequately addressed.

Given the scale, complexity, and cumulative nature of the Proposed Development, together with the acknowledged uncertainties identified throughout the planning application documents, it is considered that the information currently available is insufficient to support an informed determination.

For these reasons, consent should not be granted based on the current application. The Applicant should instead be required to provide further assessment and evidence to address the matters identified in this objection before the Proposed Development is taken forward.

Thank you for your attention to this objection.

Kind Regards,

[Redacted]

[Redacted]

REFERENCES

1. Goddijn-Murphy, L.M. (2026). 10 Things to consider before approving another offshore wind farm: A case study for Highland, Scotland. *Ocean Coast. Manag*. Volume 271, 107956; https://doi.org/10.1016/j.ocecoaman.2025.107956
2. The Scottish Association for Marine Science (2025. The Ocean Enters the Boardroom Available online: https://www.sams.ac.uk/news/sams-news-ocean-on-the-board (Accessed 20 Jul 2026).
3. ScottishPower (2026). Windfarm Development Area. Environmental Impact Assessment Report – Non-Technical Summary. Available online: https://marine.gov.scot/sites/default/files/non_technical_summary_4.pdf (Accessed 29 June 2026).
4. North Sea Energy (2024). Use of Space—North Sea Energy. Available online: https://northseaenergyroadmap.nl/use-of-space (Accessed on 29 June 2026).
5. ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 21 Major Accidents and Disasters. Available online: https://marine.gov.scot/sites/default/files/chapter_21_major_accidents_and_disasters.pdf (Accessed 17 Jul 2026).
6. Royal Navy News (2025). Royal Navy monitors Russian activity in UK waters. Available online: https://www.royalnavy.mod.uk/news/2025/may/29/20250529-royal-navy-monitors-russian-activity-in-uk-waters (Accessed 20 Jul 2026).
7. BBC News (2025). How serious is the Russian spy ship move? Available online: https://www.bbc.co.uk/news/articles/c4gpgj6d4e6o (Accessed 20 Jul 2026).
8. BBC News (2026). Chinese firm's Highland port plans blocked by UK government. Available online: https://www.bbc.co.uk/news/articles/c995xjxk97mo (Accessed 20 Jul 2026).
9. East Lothian Courier (2015). Port Seton fishermen fear for lives from unexploded bombs. Available online: https://www.eastlothiancourier.com/news/25054490.port-seton-fishermen-fear-lives-unexploded-bombs/ (Accessed 20 Jul 2026).
10. Sealetters (2025). Save the Phytoplankton. Available online: https://sealetters.substack.com/p/fight-for-phytoplankton (Accessed 20 Jul 2026).
11. Daewel, U., Akhtar, N., Christiansen, N. *et al.* (2022) Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea. *Commun. Earth Environ.*, 3, p. 292; https://doi.org/10.1038/s43247-022-00625-0
12. Plymouth Marine Laboratory (2026). Decline in plankton across North East Atlantic sends stark warning for ocean health | LinkedIn. Available online: https://www.linkedin.com/pulse/decline-plankton-across-north-east-ogvpe/ (Accessed on 21 Jul 2026).
13. ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 7: Marine Physical Environment. Available online: https://marine.gov.scot/sites/default/files/chapter_7_marine_physical_environment.pdf (Accessed on 20 Jul 2026).
14. ScottishPower (2026). MachairWind Offshore Windfarm Chapter 1 Introduction. Available online: https://marine.gov.scot/sites/default/files/chapter_1_introduction_3.pdf (Accessed on 20 Jul 2026).
15. ScottishPower (2025). MachairWind Offshore Windfarm. Windfarm Development Area. Information Booklet: Autumn 2025. Available online: https://www.scottishpowerrenewables.com/documents/d/guest/MachairWind-Information-Booklet-Autumn-2025 (Accessed on 20 Jul 2026).

16. TNO (2025). Better damage prediction for offshore wind turbine blades. Available online: https://www.tno.nl/en/newsroom/2025/03/damage-prediction-wind-turbine-blades/ (Accessed 20 Jul 2026).
17. Met Office (2025). Northern Scotland: climate. Available online: https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/weather/learn-about/weather/regional-climates/northern-scotland_-climate-met-office.pdf (Accessed 20 Jul 2026).
18. Sealetters (2025). Wind Farming. Available online: https://sealetters.substack.com/p/wind-farming (Accessed 20 Jul 2026).
19. G.J. Watson, G. Banfield, S.C.L. Watson, *et al*. (2025). Offshore wind energy: assessing trace element inputs and the risks for co-location of aquaculture. *npj Ocean Sustain*, 4, p. 1; https://doi.org/10.1038/s44183-024-00101-6
20. ScottishPower (2026). MachairWind Offshore Development: Appendix 10.1 Underwater Noise Modelling Report. Subacoustech Environmental Report No. P312R0103. Available online: https://marine.gov.scot/sites/default/files/appendix_10.1_underwater_noise_modelling_report.pdf (Accessed on 20 Jul 2007).
21. Duarte C. M. *et al.* (2021). The soundscape of the Anthropocene Ocean. *Science* 371, eaba4658. https://doi.org/10.1126/science.aba4658.
22. Williamson, B.J., Goddijn-Murphy, L., McIlvenny, J., Youngson, A. (2024). Potential exposure of aquatic organisms to dynamic visual cues originating from aerial wind turbine blades. *Fishes*, 9(12), 482; https://doi.org/10.3390/fishes9120482.
23. Haskoning (2025). Appendix 7.1 - Marine Physical Environment Numerical Modelling. Available online: https://marine.gov.scot/sites/default/files/appendix_7.1_marine_physical_environment_numerical_modelling.pdf. (Accessed on 20 Jul 2026).
24. Sauvage, C., Seo, H., Zippel, S., Clayson, C. A., & Edson, J. B. (2025). Fetch-dependent surface wave responses to offshore wind farms in the Northeast U.S. Coast. *Journal of Geophysical Research: Oceans*, 130, e2025JC023156. https://doi.org/10.1029/2025JC023156
25. Gautier, C., Emmanouil, A., Leummens, L. (2025). First Steps to Assess How Offshore Wind Farms Affect Waves and Currents. Document ID 11210382-001-HYE-0001. Version 2.0. Available online: https://publications.deltares.nl/11210382_001_0001.pdf (Accessed on 20 Jul 2026).
26. Sealetters (2025). Wind Wars. Available online: https://sealetters.substack.com/p/wind-wars (Accessed 20 Jul 2026).
27. ESB (2024). Welcome to Malin Sea Offshore Wind. Available online: https://malinseaoffshorewind.com/home (Accessed on 20 Jul 2026).
28. NatureScot (2026). NatureScot GIS data viewer. Available online: https://ogc.nature.scot/geoserver/www/maps/naturescot-data-viewer.html?layer=renewables:windfarm (Accessed on 20 Jul 2026).
29. UK Government (2025). Draft: Supplementary guidance for renewable energy infrastructure (EN-3): Offshore wind wake effects (accessible webpage). Available online: https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-2025-revisions-to-national-policy-statements/outcome/draft-supplementary-guidance-for-renewable-energy-infrastructure-en-3-offshore-wind-wake-effects-accessible-webpage (Accessed on 20 Jul 2026).

30. BBC News (2026). Plans for huge wind farm paused over 'unfair' grid charges. Available online: https://www.bbc.co.uk/news/articles/c8x919v8g19o (Accessed on 20 Jul 2026).
31. Iona Community Council (2026). Proposed MachairWind Offshore Wind Farm. Updated note (v.2). Available online: https://tireecommunitycouncil.co.uk/wp-content/uploads/2026/05/Iona-brief-MachairWind-v2.pdf (Accessed on 20 Jul 2026).
32. Browne, G.R., Leckey, M. (2022). Social cohesion and local democracy as determinants of health: Testing the liveability framework for health impact assessment of a major infrastructure, *Environmental Impact Assessment Review*, Volume 96, 2022,106817. https://doi.org/10.1016/j.eiar.2022.106817.
33. ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 3 Project Description. Available online: https://marine.gov.scot/sites/default/files/chapter_3_project_description.pdf (Accessed on 20 Jul 2026).
34. Li, L, Kang, X. (2025). Recycling wind turbine blades: A comprehensive review of challenges, solutions, and future directions, *Journal of Building Engineering*, Volume 114, 114489, https://doi.org/10.1016/j.jobe.2025.114489.
35. UK Government (2012). The Waste (Scotland) Regulations 2012. Available online: https://www.legislation.gov.uk/ssi/2012/148/contents (Accessed on 20 Jul 2026).
36. TNO (2025). Offshore Wind Farm Decommissioning Cost Estimates. TNO 2025 R11554. Available online: https://publications.tno.nl/publication/34645671/IokAEuCy/TNO-2025-R11554.pdf / (Accessed on 20 July 2026).
37. Eigen Vaλues (2025). Offshore Wind Decommissioning Timebomb. Available online: https://davidturver.substack.com/p/offshore-wind-decommissioning-timebomb (Accessed on 20 Jul 2026)
38. Historic Environment Scotland (2026). Iona Abbey | Historic Scotland. Available online: https://www.historicenvironment.scot/visit/all/iona-abbey-and-nunnery/ (Accessed on 20 Jul 2026).
39. Scottish Power (2026). MachairWind Offshore Windfarm. Chapter 16 Seascape, Landscape and Visual Impact Assessment. Available online: https://marine.gov.scot/sites/default/files/chapter_16_seascape_landscape_and_visual_impacts.pdf (Accessed on 20 Jul 2026).
40. ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 18 Socio-economics. Avaialble online: https://marine.gov.scot/sites/default/files/chapter_18_socio-economics.pdf (Accessed on 20 Jul 2026).
41. KNOCKvologan (2026). Hebridean Horizons. Available online: https://knockvologan.net/studies-projects/2021/12/11/hebridean-horizons (Accessed on 20 Jul 2026).
42. Scottish Government (2023). National Planning Framework 4. Available online: https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4.pdf (Accessed on 20 Jul 2026).

Member of the Public 4965

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	OBJECTION REPRESENTATION: MachairWind Offshore Wind Farm Application (Generation & Transmission Assets)QA
Date:	30 July 2026 10:39:59

I would like to raise my very strong objection to the proposed Scottish Power Application for the
2GW Machair Offshore Wind Farm.
I can recall a similar application some 10 years ago which, not surprisingly, was firmly rejected and
so should this one be.
The West Coast of Scotland and the Hebridean Islands in particular is an area of "Outstanding Natural
Beauty" and a precious part of Scotland's National Heritage and it is incumbent on us to protect and
preserve this not only for ourselves but also for generations yet to come.
Our beautiful West Coast Islands are recognised by the increasing number of visitors from elsewhere
In the UK and from other countries. I have been coming with my family to Colonsay for 40 years now
and we all appreciate the outstanding beauty, peace and tranquility that the Island provides.
I do appreciate the need to increase our "Green Energy", but to sacrifice the Inner and Southern
Hebridean Coast for this project would, in my view, be an act of great folly.

Yours Sincerely, **[Redacted]**

9EX

Member of the Public 4966

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	MachairWind - Objection
Date:	14 August 2026 17:29:55

Dear Sir/Madam,

MachairWind Offshore Wind Farm - Objection

I object to the MachairWind proposal for the following reasons:

- The proposal is an inappropriately large industrial scaled development in an environmentally sensitive location.
- It will negatively impact on some of the most cultural and historically sensitive island areas in Scotland.
- Negative visual effect on landscape and seascape.
- Detrimental effect on tourism, habitability and island sustainability.
- Negative impact on island connectivity, safety at sea and inshore fisheries.
- Adverse effect on ecology and biodiversity.

Yours faithfully,

[Redacted]

Member of the Public 4967

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Machair Wind proposal: Objection
Date:	14 August 2026 09:52:41

Dear Sirs,

This email is sent to register my objections to the proposed Machair windfarm development.

1. Columba's Bay at the south end of Iona is reputed to be the landing place of the founder of Iona Abbey centuries ago. As such it has always been a place of pilgrimage - a tradition which continues to this day. It is therefore surprising that a "visualisation" of the scenic impact has not been provided based on this extremely historically and culturally important location. Had such a visualisation been available it would bring home the severe scenic impact on what many people regard as not only valuable, but in some cases a sacred place.

2. The scale of the proposed development is unprecedented in UK waters in terms of its proximity to shores. Comparable developments in terms of the height, area and density of arrays are much further offshore and employ floating rather than fixed support, and existing developments of the proposed scale are at most barely visible from shore.

3. Scottish Power (onshore at least) has a track record of "proposing big" and subsequently "negotiating reductions" in light of comments received during consultations. I therefore question whether there is a tactical aspect to the very large number and/or size of the installations which has been proposed. How many potentially "sacrificial" towers are included in the current proposal?

4. A similar concern might be raised in relation to the remarkably small figure which had been mooted as financial support for affected communities, which may be a tactic to "offer low" and "negotiate an increase". In reality, the potential adverse financial impact, particularly on tourism revenue throughout the Inner Hebrides is likely to be vastly more than any financial compensation Scottish Power would ever countenance.

5. In Scotland, there is no provision (outside of a Judicial Review) for any form of Public Hearing at which the developer and its proposal can be interrogated directly by members of the public and especially communities likely to be directly affected. This contrasts with the situation in England where such public hearings are a normal occurrence, and which can provide material input to the permitting process.

Yours sincerely

[Redacted]

[Redacted]

Member of the Public 4968

From: [Redacted]
To: MD Marine Renewables
Subject: Machair Wind Farm - Objection
Date: 29 July 2026 12:35:45

Dear Ministers,

I wish to object strongly to the proposed MachairWind Offshore Windfarm on the following grounds:

1. It is a huge windfarm of 91 turbines, all taller than the Eiffel Tower, which will be very clearly visible from its neighbouring islands - particularly Iona and Colonsay. It is too big to be sited so far "inshore".

2. It will bring no benefit to its neighbouring islands at all. Islay is one of 5 islands included in the Carbon Neutral Project, currently heavily dependent on oil to feed its energy-hungry distilleries, yet no power from this proposed development will be provided directly to Islay. And please do not trot out the usual trope about providing employment: (a) it won't and (b) more jobs are not required in Islay - we already have a shortage of people to service hospitality, the care system, the postal service etc etc, at least in part because of lack of affordable housing. Islay does not need more jobs, and I doubt whether Iona or Colonsay do either.

3. The energy to be produced is simply not needed. I understand it is to come ashore in Ayrshire and directed to Wales. Wales is already a net exporter of renewable energy and does not need more. Scotland has already (Seagreen in 2024) been paying windfarms NOT to produce.

4. Behind the facade of Scottish Power Renewables, which the general public probably think is a publicly-owned company but of course is not, stands the real developers Iberdrola, a Spanish multinational company. They stand to benefit from a substantial grant from the UK government (tax-payers' money), plus whatever the Scottish government ultimately pay them (more tax-payers' money) not to produce the energy which is not required.

Overall, this is a "wheeze" by a foreign multinational company to extract money from the British and Scottish taxpayers at the expense of the "little people" - the inhabitants of the southern Hebrides. I trust it will be rejected outright.

With kind regards,

[Redacted]

[Redacted]

and on Fb and Messenger

Member of the Public 4969

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Machair Wind Farm
Date:	29 July 2026 19:32:34

Subject: Representation Objecting to the MachairWind Offshore Wind Farm Application

To: Marine Directorate – Licensing Operations Team

Dear Sir/Madam,

I am writing to object to the proposed MachairWind Offshore Wind Farm application.

I am a permanent resident of the Isle of Tiree. My home is situated on the south-east coast of the island, and the proposed wind farm would be visible from my property and from many locations that I use regularly. My objection is based on the significant and lasting impacts that this development would have on the landscape, seascape, natural environment and the communities that depend upon them.

My principal concerns are as follows:

1. Significant visual and seascape impact

The waters surrounding Tiree, Mull, Iona and the wider Inner Hebrides are recognised for their exceptional natural beauty and sense of openness. The introduction of a very large offshore wind farm would fundamentally alter the character of these seascapes.

The uninterrupted views across the Atlantic are one of the defining features of Tiree. The proposed development would industrialise what is currently a largely natural horizon, reducing the sense of remoteness and tranquillity that residents and visitors alike value.

As someone who would see the development from my own home, this represents a substantial and permanent change to the environment in which I live.

2. Impact on landscape character and scenic value

The landscapes and coastlines of the Hebrides are internationally recognised for their outstanding scenic qualities. The cumulative effect of hundreds of turbines, aviation lighting and associated offshore infrastructure would diminish the unique landscape character that attracts visitors from around the world.

Once this character is lost, it cannot realistically be restored.

3. Impact on tourism

Tourism is one of the principal economic drivers for Tiree and neighbouring islands. Many visitors come specifically for the unspoilt scenery, wide horizons, dark skies, wildlife and feeling of escape from industrial development.

There is a genuine risk that the industrialisation of the surrounding seascape could damage Tiree's reputation as a destination for nature-based and landscape tourism, with consequential effects on local businesses, accommodation providers, restaurants, outdoor activity providers and the wider island economy.

4. Wildlife and marine environment

The waters surrounding Tiree support internationally important populations of seabirds, marine mammals and other protected species. I remain concerned about the potential effects of the construction and operation of such a large development, including underwater noise, habitat disturbance, increased vessel movements and collision risks for birds.

Given the ecological importance of this area, I believe the precautionary principle should be applied where there remains uncertainty over long-term impacts.

5. Cumulative impacts

This proposal should not be considered in isolation. Scotland's west coast is facing multiple offshore renewable developments, and their combined effects on landscapes, wildlife, navigation and coastal communities could be substantially greater than the impact of any one project alone.

I am concerned that cumulative impacts have not been given sufficient weight.

6. Effects on local communities

Island communities such as Tiree rely heavily upon their natural environment for their quality of life, wellbeing and economic sustainability. Residents who experience the visual impacts every day will bear the long-term consequences of this development while receiving relatively limited direct benefit.

I believe the interests of communities living closest to the development deserve significant consideration.

7. Dark skies and night-time impacts

The Hebrides are valued for their exceptionally dark skies. The aviation warning lights required on offshore turbines have the potential to introduce significant light pollution into an area where darkness forms an important part of the natural environment.

8. Irreversible change

While I recognise the importance of renewable energy in addressing climate change, I do not believe every location is suitable for industrial-scale development. The west coast of Scotland contains some of the country's most iconic and least disturbed coastal landscapes. Once transformed by a development of this scale, these landscapes cannot be returned to their previous condition.

Renewable energy should be developed in locations where environmental and community impacts are minimised. In my view, this proposal fails to achieve an appropriate balance between the need for renewable generation and the protection of nationally important landscapes and island communities.

For these reasons, I respectfully request that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm application.

Thank you for considering my representation.

Yours faithfully,

[Redacted]

Member of the Public 4970

From: [Redacte
To: MD Marine Renewables
Subject: MachairWind
Date: 27 July 2026 19:07:38

Dear sir,

I wish to lodge an objection to this huge offshore wind development. The proposed area is one of the most beautiful and unspoiled landscapes in our country, and views of the sea from Mull, Iona and Staffa would be sullied to a high degree. Please do not give approval to this application as this pristine stretch of wild land and sea would be forever tainted by the visible turbines, spoiled for all future generations.

Yours faithfully,
[Redacted]

Sent from my iPhone

Member of the Public 4971

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	MachairWind Offshore Wind Farm (Marine Directorate references 00012385 and 00012386)
Date:	26 July 2026 11:21:46

Dear Sirs,

I hereby submit a formal objection, on the following grounds, to the proposals put forward by MachairWind Limited (ScottishPower Renewables) for the MachairWind Offshore Wind Farm, as detailed in application numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, applying for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be formally recorded, that I be registered as an objector, and that I receive notification of the final decisions regarding these applications.

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.

Seascape, Landscape and Visual Effects

The practical consequence of the proposal's deficiencies is a failure to comply with

key planning policies designed to safeguard nationally important landscape and seascape interests. The effects of the development engage multiple provisions, 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. Notwithstanding these policy requirements, the applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it sets out. Furthermore, there is a clear absence of evidence showing that the proposal meets the protections afforded to nationally significant landscapes and seascapes under the relevant policy framework. In conclusion, the proposal does not comply with the policies intended to protect these important environmental assets and should not be approved on that basis.

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.

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 alongside a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area (SPA), specifically concerning the guillemot population. These documents are expressly prepared for situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their presence in the application therefore signals a recognition by the applicant that the proposed development could impact the SPA, necessitating measures under derogation provisions to address such impacts.

It is important to emphasise that the submission of these documents is a significant feature of the application. They serve as a precautionary framework intended to mitigate or compensate for any harm that may be identified following detailed assessment by the competent authority. The applicant's approach inherently accepts that the Scottish Ministers might reach a different conclusion regarding the likelihood or extent of adverse effects on the protected site than the applicant. This underscores an element of uncertainty and the need for robust safeguards to ensure the conservation objectives of the SPA are not compromised.

In conclusion, the inclusion of the Derogation Case and Compensation Plan demonstrates the applicant's preparedness to engage with the statutory processes designed to protect designated sites. It reflects an understanding that adverse effects cannot be excluded at this stage and highlights the necessity for careful scrutiny by decision-makers. Given the sensitivity of the North Colonsay and Western Cliffs SPA and the importance of the guillemot population therein, these documents must be thoroughly considered as part of the planning determination process.

Effects on Local Area

The applicant's environmental and heritage impact assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment has practical consequences, as it undermines the reliability of the evaluation upon which planning decisions must be based. 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 primarily considers Islay only as a potential project location. It neglects to assess Islay as an affected island community in its own right. Notably, Islay's Atlantic-facing communities are situated nearest to the edge of a 448 square kilometre development area, yet no place-based assessment has been undertaken to evaluate how the development might affect their setting, local economy, or community life.

The omission is equally apparent with respect to Colonsay and Oronsay, where the seaward outlook forms a defining feature of daily life and faces the proposed development directly. The North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest acknowledgment within the application that harm to the internationally protected seabird population inhabiting these cliffs cannot be ruled out. Such acknowledgement further highlights the need for a thorough, place-specific assessment of the potential impacts on Colonsay's natural environment, which the current submission does not provide.

Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's area and benefits from statutory protection. The heritage assessment's identified gaps apply fully to the evaluation of the monument's open maritime setting, which remains insufficiently considered. The failure to robustly assess the effects on this nationally significant heritage asset, alongside the broader community and environmental concerns for Islay, Colonsay, and Oronsay, calls into question the completeness and credibility of the overall impact evaluation presented by the applicant. Without rectifying these deficiencies, the application cannot be regarded as adequately addressing the interests of these island communities or the protection of their valued heritage and environment.

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 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 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 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 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 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.

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.

As a former resident of one of these impacted islands, I urge Scottish Ministers to refuse consent for the wind farm and deny the marine licence.

Yours faithfully,

[Redacted]

Member of the Public 4972

[Redacted]

6th August 2026

To whom it may concern

I strongly object to the proposed Nacharo Wind Offshore windfarm. Environmental destruction with little benefit.

[Redacted]

Member of the Public 4973

A Response to the MachairWind Development Proposal

To: **MD.MarineRenewables@gov.scot**

From: [Redacted]

[Redacted]

Date: 11th August 2026

1. I am responding to this proposal as a member of the Iona Community, the international Christian Community which runs Iona Abbey as a hospitality, retreat and conference centre on the island of Iona. The centre is run for the benefit of our guests who gain from its common life, its programmes, and particularly the environment of Iona with its views of mountains, islands and open ocean.

2. I have a professional background in civil engineering, education and church leadership, and I have been actively involved in campaigning for increasing the generation of renewable energy for several decades. I have made my home almost carbon neutral, and I keep my transport consumption of fossil fuels as low as possible. I am also fully aware that renewable energy generation is not without its impact on the environment.

3. However, Iona is a significant place of heritage, tourism and pilgrimage. It is in fact one of the world's great pilgrimage sites. Its significance is beyond Scottish national importance, as is demonstrated by the number of visitors each year from many parts of the world.

4. As a community with a centre on Iona we can verify from our own experiences that what our visitors seek and currently find is not just the experience of particular locations on the island, such as the Abbey, Reilig Oran, etc., but the island in its totality which includes the vistas to the south and west across the open Atlantic. The existence of a visible windfarm in the area proposed would seriously reduce that.

5. Whilst this would not impact the historical significance of Iona it would make the island less attractive to visitors and negatively impact its economy. The proposal uses general data for assessing the impact of the windfarm whereas its impact will vary considerably from island to island and in different parts of the mainland. This is one way that Iona would be specifically and seriously affected.

6. The stretch of coast in which Iona lies has been designated an area of landscape significance, and part of its significance is its sense of wild remoteness. Our visitors appreciate this. It has been well established that the existence of such places contributes to people's mental wellbeing even if they rarely, or even never, visit them. Since the pioneering work of John Muir this has been one of the principles behind the adoption worldwide of

national parks. An array of wind turbines on the horizon would significantly detract from this effect. And it is admitted in the planning submission that they would be very visible from many places on Iona. In fact, they would not only be visible but would draw the eye.

7. With others in the Iona Community I am fully behind the aspirations of the Scottish Government as set out in its 2023 Draft Energy Strategy and Development Plan. However, I am concerned that the necessary rush to increase renewables could lead to bad decisions being made if there is not enough investment in research. Such research needs to be into the different means of generating energy, which in Scotland can include hydroelectric, solar and tidal generation as well as wind, and into the impact of particular proposals on their local environments and communities.

8. Like many others in the Iona Community I have experience of small projects in horticulture, agriculture, developmental engineering and community development which cumulatively add up to a big impact. Approving the development of a few big projects, such as the MachairWind proposal, is administratively simpler than supporting many small ones, but it can have a greater negative impact.

9. For example, some of the impact of the MachairWind proposals would be from the height of the turbines, because increased elevation means greater windspeed. But along this stretch of the Scottish coast the same elevation could be achieved without the need for great towers by designing turbines to be constructed on mountains near the ground. Designing the equipment and choosing the optimum location to balance minimum visual impact with efficiency would be complex, but with computer simulation and detailed satellite surveying, this could surely be done. So too, greater use could be made of the tides around the islands to generate reliable electricity. This would involve many small projects but the cumulative effect would be great.

10. So, while I am fully in support of the development of renewable energy and working swiftly towards net zero, my objection to this proposal is not about windfarms but about this particular proposed development. No one would seriously countenance putting a large turbine on the esplanade at Edinburgh Castle, beside the golf course at St Andrew's or on top of Ben Lomond because, although these places would still exist and could be visited, it would be considered an act of cultural vandalism. So too would the development of a large windfarm off the coast of Iona.

Member of the Public 4974

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Marine Directorate - Licensing Operations Team,
Scottish Government,
375 Victoria Road,
Aberdeen, AB11 9DB

By email to
md.marinerenewables@gov.scot

15 August 2026

Dear Licensing Operations Team

Applications by ScottishPower Renewables/MachairWind Limited
Application reference number: 00012385

Introduction

This note contains my representations to the Scottish Ministers against the approval of the MachairWind windfarm applications. My locus is that of a long-standing visitor to Colonsay, and now since 2022 as the owner of a cottage at Uragaig, on the north-west coast of the island. Though that house was purchased and is taxed as a second home, for the past three years I have spent more time on the island than at my primary residence on the mainland, and my current plan is to dispose of the latter during the course of nextyear. This will allow me to concentrate more of my time and resources on my residence on Colonsay.

My main reason for objecting to the MachairWind application is the catastrophic and irreparable visual damage it would do to Colonsay's setting and seascape, and the other adverse impacts that would result. The totality of these disbenefits would not be offset by any meaningful benefits to Colonsay and the other island communities that would be disadvantaged by the wind farm. I accept and acknowledge the urgent need to decarbonise energy production and have no objection in principle to wind generation. But there is nothing in the MachairWind proposals that can uniquely demonstrate climate change and economic benefits, locally or more widely, that could not be achieved in a less sensitive location or indeed by a different technology.

In making my personal objection I also wish to emphasise my support for the extremely cogent and well-evidenced objection that has been submitted by Colonsay Community

Council.[1] I endorse and wish to incorporate by reference in my submission all of that document's seven Grounds for objection, as follows:[2]

> first, that the site was selected without consulting the islands most affected and in disregard of the statutory adviser's own design guidance [Ground 1 – CCC pages 4-5)
>
> secondly, that the development would cause major and significant harm to Colonsay's coast which the applicant has identified but not mitigated (Ground 2 - CCC pages 5-8);
>
> thirdly, that it would irrevocably devastate the setting and sense of place of the listed scheduled monument, Oransay Priory (Ground 3 – CCC pages 8-10);
>
> fourthly, that the socio-economic effects on the island have never been assessed (Ground 4 – CCC pages 10-13);
>
> fifthly, that construction noise as experienced on Colonsay has not been assessed (Ground 5 – CCC page 13);
>
> sixthly, that unresolved scientific doubt attaches to the protected seabird colony of Colonsay's own cliffs (Ground 6 - CCC pages 13-15);
>
> and seventhly, that only part of the project has been put forward for assessment (Ground 7 – CCC pages 15-16).

I also share the Community Council's request for an inquiry in public into this application if Ministers are not minded to refuse it initially.[3]

Rather than burdening this note by repeating the detail and source references contained in the Community Council's submission, my intention in the remainder of my objection is to add my personal observations on the visual and other harm that would result from the massing of huge engineered intrusions in the sea in close proximity to Colonsay; to introduce a new matter for consideration that is not covered in the Community Council objection; and to provide comments on the distribution of costs and benefits arising from the application.

Visual impacts of the proposed wind farm

The MachairWind proposals would locate a massing of turbine pylons off the west coast of Colonsay and Oransay, with the closest structures just under 12 km from the shore. As the Community Council submission notes, this is far closer than specific guidance from Scottish Natural Heritage advised in relation to Colonsay.[4] The Applicant's own

[1] CCC_Objection_MachairWind_Submission.pdf [Cited subsequently as CCC]
[2] CCC, pages 2-3
[3] CCC p 17
[4] CCC p 4 para 14

documentation acknowledges the severe adverse visual impacts that would result at receptors on the island's west coast.[5]

The Community Council objection also emphasises the fundamental role of tourism in the island's economy, tourism that is attracted by Colonsay's unique attractions.[6] I am far from alone in my personal view that one of the island's greatest assets is the variety of seascapes that are visible from Colonsay, with one of the most important being the outlook from the island's west coast across open sea to the distant horizon, which on exceptionally clear days can extend as far as Malin Head in Donegal.

But the view to the open Atlantic from Colonsay is not of an empty seascape – the north-westerly view is framed by Mull; then there is the long south-westerly sweep through Iona and the Torran rocks, punctuated by Skerryvore and Dubh Artach lighthouses. The sunset views are spectacular, and the far horizon often displays banks of noctilucent cloud reflecting the last of the evening sun. In such a setting it is not difficult to understand the feelings ththat led to the creation of the Gaelic myth of Tir na n'Og.

This view is priceless, but it will be destroyed if the MachairWind proposals go ahead. Most of the westerly views from road level and shore locations will be fenced in by day or by night by the turbines. Dubh Artach lighthouse itself will be dwarfed by them - and surrounded by red beacon lights after dark.

Furthermore, the visual damage to Colonsay will not be confined to receptors on Colonsay. Much has been made of the maximum height of the pylons, which will be taller than any building in the UK.[7] But the more important comparison is with the landform of Colonsay itself, which although rugged is relatively low-lying. The highest point on the island is Carnan Eoin, 143 metres above sea level, less than half the height of the tallest proposed turbines. Despite their sheerness, Colonsay's western cliffs are at most 100 metres above sea level. **For the full length of the island the pylons will be higher than Colonsay's landform.**

Because of Colonsay's north-east – south-west axis, the pylons will appear in most of the distant views of the island from Mull, the Argyll mainland, and the islands to the north and east of Colonsay. The photomontages that were commissioned by MachairWind in 2025 provide ample evidence of how Colonsay's setting will be visually degraded in distant views from many directions.[8] What is less clear is the actual extent to which nearer views – and viewers' impressions of the island – will also be damaged by pylons appearing as alien protrusions above the island's silhouette when viewed from land or sea to the east of Colonsay.

---

[5] CCC p 6 Table 1

[6] CCC p 12 para 26

[7] CCC p 2 para 5. It should also be noted, although the application specifies a maximum high of 335 metres, the visualisations cited in the following footnote are all caveated with the reservation that this was the largest height then commercially available. That comment surely implies that a greater height may be sought at construction stage.

[8] MachairWind Autumn Consultation 2025_Photomontages.pdf

There will undoubtedly be that adverse visual effect on nearer views, but unfortunately, by accident or design, the images of Colonsay from east of the island included in the photomontages offer only limited evidence of the linear extent of this protrusion. The two views that were taken from the Kennacraig and Oban ferries, Viewpoints 9 and 17 respectively, are at a distance, and angled to represent only pylons behind the lower-lying south and north extremities of the island. Those pylons would of course be visible to sea passengers to and from Colonsay in those positions, and both Viewpoints suggest that further pylons might come into sight as the vessels approached the harbour at Scalasaig – the fish farm off the north-eastern coast of Colonsay requires the Oban ferry to follow a more easterly course to and from the harbour.

The most extensive Viewpoint, An Cruachan on Jura (12), shows an array of pylons as visible behind the full length of Colonsay; however, that image was taken at 187 meters above ordnance datum, higher than any point on Colonsay. Further and more relevant imaging is therefore required before the full extent of the visual impact of such protrusions on receptors east of Colonsay can be accurately gauged, but this will undoubtedly be significant for ferry passengers and those on the cruise ships which now regularly call at Colonsay. Land-based views of Colonsay from the west coast of Jura and the north-western coast of Islay are also likely to be damaged, but the numbers of individual receptors in these areas will probably be small.

One other comment on the potential visual impacts of the windfarm on the seas surrounding Colonsay is relevant. That is the cultural significance of the sea crossing from Ireland in the early mediaeval establishment of Dalriada and in the Columban mission to Scotland. While much of this activity was of course focused on Iona, Oransay played a part in the outreach of the Celtic church. These waters, which subsequently became crucial to the Lordship of the Isles, are an intrinsic part of the cultural setting of the southern Hebrides – as the Convener of the Iona Community Council recently stated, the MachairWind proposal "would industrialise an undeveloped, nationally and internationally-significant cultural and natural heritage landscape".[9]

Other adverse impacts of the windfarm

More mundanely, the waters west of Colonsay that would be occupied by MachairWind are both a sea lane that is used regularly by commercial vessels and recreational craft, and a local fishing ground. All of these activities would be affected by a windfarm, but as the Colonsay Community Council submission notes, these impacts, though previously identified by the Scottish Government, have not even been considered within the MachairWind application.[10]

Another deficiency noted by the Community Council is the absence of any reference to the construction noise that would be experienced on the island during a lengthy construction period.[11] But humans will not be the only receptors of noise – bird and

[9] Iona wind farm: Could 91-turbine project reshape Scotland's coast? | The Herald
[10] CCC p 11 para 44
[11] CCC p 13 paras 51-4

marine life would also be affected. In the case of the latter, vibration and underwater noise would also be involved, both from construction and during operation.

Turning first to bird life, Colonsay is the principal seabird centre in the Inner Hebrides,[12] with a Special Protection Area applying to the island's northern and western cliffs. Colonsay also has important nesting and visiting populations of other bird species, many of them endangered, and lies on passage migration routes. The risks to birds of huge rotating blades set in a dense mass and at different heights are self-evident, but the windfarm will itself occupy an important feeding ground for seabirds and for marine life, including protected species such as basking sharks, The application's treatment of the adverse impacts of the MachairWind proposals on bird and marine life is limited (there is no evidence at all about the effect on cetaceans), highly selective, and in places contradictory.[13] The Scottish Ministers have important separate statutory obligations for habitat and wild life protection, and it is essential that these obligations are fully discharged when considering this application.

Safe, sustainable execution and operation?

On 10 May 2026, in connection with the application for the Spiorad na Mara windfarm off the Atlantic coast of Lewis, the Herald ran a story about the collapse of a similar project off the coast of Galway and Clare in Ireland.[14] In fact the Irish project, the proposed Sceirde Rocks windfarm, had been formally withdrawn by its promoters on 25 April 2025, only three months after the planning application had been submitted, but much of the information used in the Herald article only emerged through a court case raised by dissatisfied local investors in the scheme, whose shares had become valueless.[15] The lead funder in the scheme was a subsidiary of the Macquarie Group, a long-established and experienced international bank and infrastructure investment company, partnered with the Ontario Teachers Plan Board, a similarly well-experienced investor this field.

The withdrawal resulted in the loss of a €35.4m performance bond that the promoters had lodged with the Irish government, as well as the funds that that had be spent in developing the scheme and preparing the application. The reasons given for the withdrawal were that updated modelling revealed that extreme weather forces exceeded design thresholds for turbine stability, and that structural simulations highlighted fatigue risks in turbine blades and foundation systems. Consequently, the promoters concluded that continued investment would not guarantee safe or sustainable operation. Insurers also withdrew support after reassessing long-term risk exposure.

The Sceirde Rocks scheme had been developed over a period comparable with that for MachairWind, and through a similar selection and pre-approval process. As mentioned, it was led and funded by experienced investors in this sector, and though significantly

[12] D C Jardine, *The birds of Colonsay and Oronsay* (2002), p 36
[13] CCC pp 14-15, paras 58-61
[14] 'Catastrophe' warning over landmark Scots wind farm | The Herald
[15] www.rte.ie/news/business/2026/0102/1551252-plans-withdrawn-for-14-billion-wind-farm-on-west-coast/ €1.4 Billion Sceirde Rocks Offshore Windfarm Project in Ireland Dropped due to Weather Risks

smaller in scope than Machair Wind it involved the same technology of ground-anchored, rather than floating, turbines. The reason the Herald noted this withdrawal is that, in common with the Lewis Spiorad na Mara project, Sceirde Rocks nvolved exposure to Atlantic gales.

No doubt Marine Scotland is aware of the Sceirde Rocks outcome, and I am sure that MachairWind will likewise know of this. I personally know all too well the force of Atlantic storm winds and waves, and I would be extremely surprised if conditions off Colonsay were more benign than those off the Galway shore. I include mention of Sceirde Rocks in my representation in order to ask the Scottish Ministers to ensure that this experience and the evidence behind it is taken fully into account when assessing the safety and sustainability of the MachairWind scheme in this sector of the Atlantic.

Costs, benefits, and beneficiaries

Colonsay residents have come to expect little from national utility undertakings. Electricity only became available on the island through local self-help, and a connection through Islay to the national grid was only achieved with assistance from regional funding agencies. Even now, the supply is vulnerable to lengthy interruptions because of storm damage or to make new connections. Telecommunications are also poor – though a fibre optic cable was run to the island in 2022, it has not yet been connected to consumers and Open Reach continues to refuse new broadband connections because of the lack of line capacity. Though mobile phone towers have been extended in height, there are still parts of the island that lack a viable G4 signal.

Consequently, the prospect of huge electricity generation nearby contains a huge irony – none of this electricity will be directed to the island that is its nearest neighbour, yet its generation will impose significant and disproportionate costs on Colonsay through adverse impacts which MachairWind could not even begin to mitigate, let alone eliminate. Moreover, there is a real fear that, by damaging the island's attractiveness to tourism, Colonsay's key economic sector will be undermined and the island's total income diminished. No community fund, whether provided as charity or as a contractual direct levy on the revenue from the energy generated by the windfarm, could offset such a decline – one of the realities is that, despite the fact that the greatest amount of disbenefit would be incurred on Colonsay, its small population in relation to its neighbouring islands is likely to result in a proportionately small financial recompense.

It is also unlikely that Colonsay residents and businesses could generate any direct income from the construction process. Its only port, Scalasaig, is located on the "wrong" side of the island for access to the windfarm site and has no capacity for handling any significant number of supply vessels or for holding supplies. It is conceivable that the island's airport might handle some additional helicopter flights, but unless a temporary rig with a landing platform was provided on-site the usefulness of such flights would be limited to survey or inspection purposes.

The balance sheet proposed by MachairWind is therefore entirely negative from Colonsay's perspective. MachairWind's ultimate owner, Iberdrola, is based in Spain,

and positions itself as an international energy provider with a specialism in offshore generation. The financial proposition is that the sea west of Colonsay is simply an opportunity to generate energy for onward supply to southern Scotland but more likely to England, and to provide profits ultimately to a Spanish company, I feel entitled as a Scottish taxpayer to ask why Scottish residents should bear the indirect costs of this process.

As a Scottish resident and taxpayer who is personally committed to sustainable outcomes, and remembering that the MachairWind project includes using probably oil-powered vessels to deposit thousands of tons of steel and concrete, with all of its embodied carbon, in the Hebridean sea, I also feel entitled to ask what the real carbon balance is for Scotland, especially if the end usage of that electricity – and therefore its attributable carbon savings – is in England. There are other, less sensitive, sites for both on- and off-shore wind generation in Scotland; there are other means of utilising resources relating to the former Hunterston power stations. The key prior question that needs to be asked and answered is what amount of additional renewable energy capacity Scotland requires to achieve its own net-zero targets, and whether it is reasonable to sacrifice more of Scotland's unique land- and seascape resources to provide capacity beyond that needed for our domestic targets.

I close by suggesting to the Scottish Ministers that, before the decarbonisation spoils are allocated on a first-to-market basis, good governance requires an accurate and transparent accounting of all the costs and benefits involved and of their location. The MachairWind submission lacks that clarity and should be refused in its present form.

Yours sincerely

[Redacted]

Member of the Public 4975

Objection to the Proposed MachairWind Offshore Wind Farm

My name is **[Redacted]** *and as one of the owners of the Isle of Erraid I file the following objection against the proposed MachairWind Offshore Wind Farm.*

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. The application does not meet the legal requirements

On the strength of that combined body of evidence, my position is straightforward. The application submitted by ScottishPower Renewables does not meet the legal requirements that govern it, and on that basis alone neither the Scottish Ministers, in determining consent under section 36 of the Electricity Act 1989, nor the Marine Directorate, in determining the associated marine licences under Part 4 of the Marine (Scotland) Act 2010, can lawfully grant consent to this application. Among the grounds set out in full in the objections I adopt: the applicant's own consultants acknowledge potential impacts on the habitability of island communities, yet no assessment of that impact has been made for the islands nearest the development; the applicant's own coastal assessment records major, significant and unmitigated visual effects; and the applicant has lodged a Without Prejudice Derogation Case for a protected seabird colony, which is itself an admission that harm cannot be ruled out.

3. A moral appeal

Beyond the legal grounds, I ask the Ministers to commit to doing everything genuinely necessary, including but not limited to the legal arguments already advanced by the other objectors, to prevent the earning capacity of the island communities from which this development would be visible, communities whose foundation is an unspoiled and, in more than one sense, sacred landscape, from being transferred to the shareholders of a Spanish multinational.

I can find no argument that justifies why the earning capacity of these islanders should be sacrificed so that a multinational can deliver larger returns to its shareholders. Alternative forms of this project exist: further from shore, with fewer and lower turbines. The objections I adopt set out in detail that these alternatives were considered by the applicant and rejected, not because they were unworkable, but because they did not deliver the applicant's objective of maximum achievable return from this site.

4. Fix the grid first

Even setting the above aside, the practical case for refusal stands on its own. In 2025 alone, Scottish wind farms were paid roughly £343 million to switch off, curtailing more than 10 TWh of clean electricity that consumers had already paid to build the capacity for, a cost that comes straight out of household energy bills through the BSUoS balancing charge. Adding this project's 2GW and 144 turbines to an already congested corridor before that reinforcement exists does not advance the energy transition. It is a subsidy transfer from bill payers to shareholders, dressed up as decarbonisation. I ask that no consent be granted until the grid can carry what this project would generate.

5. The view from Erraid to Dubh Artach

Finally, I ask the Ministers to note one matter specific to Erraid that does not appear in the other objections before them. Erraid is the island from which the Dubh Artach lighthouse was built and serviced, and the sightline between the two remains unbroken to this day. I ask that this sightline be preserved as a specific, named constraint on any development considered acceptable in these waters, and that it be treated as a live example of exactly what this application asks the Ministers to allow to disappear.

Conclusion and requests

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I ask the Scottish Ministers to refuse

consent under section 36 of the Electricity Act 1989, and ask the Marine Directorate to refuse the associated marine licence applications under the Marine (Scotland) Act 2010.

If the Ministers are not minded to refuse, I ask in the alternative that the further information sought in the objections I adopt be required from the applicant before any determination is made.

I ask to be notified of, and given a fair opportunity to comment on, any supplementary environmental information or material change to the applications before determination, and to be notified promptly of the decision and its reasons.

[Redacted]

Member of the Public 4976

From:	**[Redacted]**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	MachairWind Offshore Wind Farm – Reference: MD-00012385/ MD-00012386
Date:	28 June 2026 09:04:48

Good Morning

I write regarding my concerns in relation to the above proposal to site an offshore Wind Farm, consisting of 91 turbines standing 340 metres high, in the unspoilt waters of the Hebrides. The proposed site is 6 miles off the coast of Colonsay, 10 miles from Islay and 13 miles from the Isle of Mull, of which I am native.

The size and scale of this project is not within keeping with the vast, unspoilt landscapes in which it is proposed. Not only would it have a significant impact on the beautiful scenery, it would also have a hugely detrimental effect on the wildlife of this unique habitat.

I cannot stress highly enough the negative impact this proposal would have on the west coast waters, and I urge those driving it forward to reconsider.

Yours

[Redacted]

Member of the Public 4977

From:	**[Redacted**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	Re: MachairWind Offshore Wind Farm Reference: 00012385 / 00012386
Date:	11 August 2026 16:41:07

Dear Sirs

As an owner of a self catering cottage on the Ross of Mull and frequent visitor to Mull and Iona over the last ten years I am writing to 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.

My objections to the development, which is situated approximately 21km off the coast of Iona, are as follows

1. Visual Impact: It will detrimentally impact an area of outstanding natural beauty being clearly visible from Iona, Mull, Colonsay and Islay all of which are considered some of the most beautiful islands in the Inner Hebrides know for their beaches, small off shore islands and panoramic coast lines. Iona in particular is considered to have a special spiritual significance being a place of pilgrimage and quiet contemplation. I fear the sight of a massive wind farm will not only impact the people living here but also deter visitors leading to a negative effect on the local economy.

2. Environmental Impact: These islands are also known for their "dark skies" which will be destroyed by the lights which are compulsory on turbines of this type. Low frequency noise can travel long distances especially during "temperature inversions" and potentially cause significant annoyance particularly at night.

3. Natural Impact: The wind farm will have a negative impact on both birds and sea life. In addition a recent study by the University of Portsmouth has raised concerns about turbine coatings leaching into the sea and poisoning the waters around them leading to a danger to human health from consuming local sea food.

4. Economic Impact: Despite some un-quantified promises made by the developers there appears to be no positive economic impact for the islands effected or it seems for Scotland as a whole as the power will be exported. In fact it is likely given current experience they will be paid not to generate.

I summary therefore I consider the development to be economically unjustifiable and given the lack of benefit and the serious impact it will have on the seascape, environment and nature request that the planning applications are rejected in their entirety. I also believe you should consider the size of the populations effected when looking at the number of objections as I feel that were this proposal to have been made off the coast of more densely populated area objections would have been far greater in number. Also these islands have visitors from all over the world who will be unaware of these proposals but who will be impacted in the future.

Given my position as set out above I wish to be formally recorded as an objector and kept informed of the decision making process including any changes to the application, future consultations and the eventual outcome.

Yours sincerely

[Redacted]

Member of the Public 4978

Scottish Ministers
Marine Directorate Licensing Operations Team
375 Victoria Road Aberdeen
AB11 9DB
MD.MarineRenewables@gov.scot

[Redacted]

To whom it may concern,

Re: Objection to the proposed MachairWind Offshore Wind Farm, Section 36 application reference 00012385 and marine licence application reference 00012386, submitted by MachairWind Limited (ScottishPower Renewables)

I write to submit a formal objection to the MachairWind Offshore Wind Farm proposals 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. Whilst the reasons to object are numerous, I have focused my objection specifically on the areas of (1) Catastrophic visual impact on both land and seascape and (2) impact on the Cultural Landscape, Archaeology and Historic Environment.

Scotland's west coast and the Hebridean islands are widely recognised for their outstanding scenic beauty, remoteness and peace and tranquillity. For hundreds of years, Iona and the surrounding islands have been destinations for Christian pilgrims. In more recent times they continue to attract people from all over the world, from all and no faiths, and it remains a place of great meaning. The introduction of colossal and large-scale industrial development is nothing short of vandalism and nothing in a proposal of this scale seems as though it could possibly mitigate.

The Environmental Impact Assessment identifies significant visual effects from viewpoints across Colonsay, Oronsay, Islay, Jura, Mull and Iona, as well as from sections of the Argyll coastline and ferry routes. It also identifies adverse effects on landscape character, coastal character and recognised landscape qualities. This is beyond imaginable and would simply destroy so many interconnected landscapes forever.

Iona alone has a unique significance for the history of the Christian Church and of Scotland, and the number of scheduled monuments therein are so vast that the Royal Commission the Ancient and Historical Monuments of Scotland 22nd report (1982) devoted an entire (and large) publication to Iona alone. The collection of Early Carved Christian stones at Iona is one of the largest in the British Isles, surpassed only in size by that at Clonmancnoise in Ireland. It beggars belief to think anyone could argue that this project respects the protections inherent in 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 focus on the integrity of nationally significant landscapes and seascapes. It is difficult to see how the historic setting of so many monuments has been assessed adequately and the evaluation in terms of archaeological significance is not comprehensive: there is inadequate consideration of so many factors, not least the way in which these places are inhabited, relate to each other and impact those who live and visit there.

I am frequently depressed and despairing reading applications for national infrastructure, but of all those I have reviewed to date, this defies words, and hence the relative brevity of my objection.

Yours faithfully,

[Redacted]

Member of the Public 4979

Marine Directorate
Scottish Government
375, Victoria Rd
Aberdeen AB 11 9DB

August 13, 2026

To:

[Redacted] Scottish Government Cabinet Secretary for Climate Action and Rural Affairs [Redacted]

[Redacted] UK Government Secretary of State for Business, Innovation, Science and Trade [Redacted]

Re: MachairWind windfarm project

Dear Sir [Redacted] and Madam [Redacted]

I am raising an objection to the Scottish Powers MachairWind wind farm application which proposes to lodge 91, 340m high wind turbines of 2GW output, negatively impacting the seascape views and blue spaces of my family's home, on the Ross of Mull. This home is more than 30 yrs in the making, a product of dreams and hard work by our daughter, and a retirement retreat for my husband and I. We join our voice of objection with the voices of all of the Inner Hebridean Community Councils, including, Tiree, Mull, and Iona, who cite adverse impacts to landscape and seascape sensitivities, marine and terrestrial wildlife ecosystems and on the socio-economic growth and productivity of the communities.

My objection is based on the following:

1. The project is a waste- there is already a surplus of electric power in Scotland and the government is paying taxpayers' money to existing wind farms to ramp down production. Thus the 2 GW energy will never be used by the Scottish electorate and plans to export to Wales are fiction, because Wales is an exporter of energy! Further, the project requires UK gov grant funding to proceed, but no electorate will approve of this wastage.
2. The most deleterious effect will be to the health of my family and of the people of the Inner Hebrides. A lifetime's exposure to 91, 340m wind turbines, looming over our shorelines, degrades our seascape blue spaces, adversely impacting our mental health and well being. The MachairWind project is a serious health hazard. Crucial to our mental health and well being, blue spaces calm the nervous system and lower heart rate, reducing stress and anxiety. Ocean view meditation improves cardiovascular health and physical fitness. The MachairWind project will rob us of these health benefits over our lifetime. There can never be "like for like compensation" for a population's harmful, longterm exposure. We urge you to reject the MachairWind windfarm proposal.

Thank you, [Redacted]

Member of the Public 4980

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	MachairWind Offshore Wind Farm
Date:	12 August 2026 14:00:07

Objection to the Proposed MachairWind Offshore Wind Farm

As a [regular / long-standing] visitor to the Ross of Mull and the islands within sight of the proposed MachairWind development, I write to object to this application.

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. Why I am writing: a visitor's perspective

I am not a resident of these islands, and I do not pretend to speak for them. I write as [someone who has visited this coast every year for the past [X] years / a frequent visitor to this coast since [year]], and I want the Ministers to understand what draws people like me back, again and again, because it is precisely what this application would take away.

I come here for what the wider landscape does to a person: an open Atlantic horizon uninterrupted by anything built by human hands, dark skies undimmed by artificial light, and a stillness that has become rare almost everywhere else. That is not a minor amenity. It is the whole reason to come, and it is exactly what the people who live here depend on for their livelihood, whether they run a guesthouse, a shop, a boat trip, or simply share their home with visitors like me for a season.

I know that if this development goes ahead, I would stop coming. Not as a protest, but because what I come for would no longer be there to find. A visitor looking out at 144 turbines, some as tall as 335 metres, standing permanently across that horizon is not looking at the island the communities objecting to this proposal are trying to protect. If people like me stop coming, in the numbers the applicant's own consultants concede cannot be ruled out, that loss falls first and hardest on the very island communities this application has never properly assessed.

3. What I am asking

I am asking the Scottish Ministers not to let that happen to people who have done nothing to deserve it, and who have already told the Ministers, in detail and at length, exactly what is at stake. I ask the Scottish Ministers to refuse consent under section 36 of the Electricity Act 1989, and I ask the Marine Directorate to refuse the associated marine licences under Part 4 of the Marine (Scotland) Act 2010.

Conclusion

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I object to the proposed MachairWind Offshore Wind Farm and ask that consent be refused.

[Redacted]

Frequent visitor to the Ross of Mull and the surrounding islands

Member of the Public 4981

From: [Redacted]
To: MD Marine Renewables
Subject: RE: Objection to the Planning Application for MachairWind Offshore Wind Farm
Date: 23 July 2026 16:37:19
Importance: High

Dear Sir / Madam,

I am writing to formally object to the planning application for the MachairWind Offshore Wind Farm.

It is considered that the Environmental Impact Assessment (EIA) does not fully assess the likely significant effects of the Proposed Development on the marine environment, human health, and coastal communities. As outlined in the following sections, key gaps in the assessment, combined with scientific uncertainty and unquantified cumulative impacts, mean that the application does not yet provide a sufficiently robust basis for determination in accordance with Scottish planning and EIA requirements. Further assessment and mitigation are therefore required before consent can be granted.

Summary of Key Concerns

The principal matters requiring further consideration before determination of the application are summarised below:

- Incomplete assessment of cumulative and indirect impacts, including interactions between offshore infrastructure, grid connection requirements and other existing or planned developments.
- Insufficient consideration of emerging environmental risks, including potential effects on marine ecosystems, phytoplankton productivity, underwater sound, moving underwater shadows, corrosion protection systems and turbine blade erosion.
- Limited assessment of infrastructure resilience, security risks and the protection of critical offshore energy assets.
- Uncertainty regarding decommissioning requirements, residual seabed infrastructure, waste management and financial security.
- Inadequate assessment of landscape, seascape, tranquillity and associated health and wellbeing effects.

The following sections provide further detail on each of these matters, including the specific information gaps, uncertainties and potential impacts identified within the application documentation. They are presented to assist the decision-maker in assessing whether the EIA provides a sufficiently robust basis for determining the Proposed Development.

Evolving Environmental Governance

The concept of granting legal personhood to the ocean and other natural systems has received increasing attention in academic and policy literature and has been implemented in several jurisdictions worldwide [1]. In Scotland, the marine environment has also been afforded institutional representation through the appointment of an Ocean Representative to the Board of the Scottish Association for Marine Science (SAMS) [2].

These developments reflect a broader evolution in environmental governance, recognising that the marine environment has intrinsic value alongside its economic and societal importance. They also illustrate the need for environmental assessments of major marine developments to remain robust, precautionary and capable of addressing evolving scientific understanding and societal expectations regarding the protection of marine ecosystems.

Infrastructure Security and Resilience

The Proposed Development covers approximately 448 kmÂ² and includes up to 844 km of subsea cables located at least 12.4 km offshore [3]. Its offshore location, extensive footprint and associated electrical and digital infrastructure mean that it forms part of an increasingly important category of critical national infrastructure. It also lies within a military exercise and training area used by the Ministry of Defence [4].

The EIA identifies malicious acts as a potential hazard [5] but does not assess the Proposed Developmentâ€™s vulnerability or resilience to deliberate interference with offshore infrastructure. Recent incidents involving Russian intelligence vessels operating in UK waters, including near northern Scotland, have highlighted growing concerns regarding the security of offshore energy assets and subsea infrastructure [6,7]. These developments demonstrate that such risks are no longer solely theoretical.

The publicly available application documents also provide little information regarding the security assurance of critical hardware, supply chains, digital systems or communications infrastructure. Given recent Government scrutiny of security risks associated with components supplied by certain overseas manufacturers, together with the decision to

prevent Ming Yang from establishing a wind turbine manufacturing facility in the Highlands [8], greater transparency regarding supplier assurance and the protection of critical systems would assist the Planning Authority and Scottish Ministers in understanding the resilience of the Proposed Development.

In view of the strategic importance of offshore renewable energy infrastructure, it is submitted that the Applicant should clarify whether these matters have been assessed and explain how the resilience of the Proposed Development to external disruption has been considered**.**

Unexploded Ordnance on the Seabed

Large quantities of unexploded ordnance (UXO) remain on the seabed in UK and European waters, posing recognised risks to marine users during offshore development activities. The EIA assesses the potential presence of UXO within the Windfarm Development Area and Export Cable Corridor based on historical military activity and identifies the associated risks [3].

The EIA also acknowledges that the Proposed Development may displace commercial fishing activity. However, it does not consider whether such displacement could increase fishermenâ€™s exposure to UXO hazards in surrounding areas, as has been reported in the Firth of Forth [9]. This represents a gap in the assessment of human safety, as risks associated with displaced activities may extend beyond the boundaries of the Proposed Development.

If commercial fishing or other marine activities are displaced, the associated UXO risks may likewise be displaced. The assessment should therefore extend to consider areas into which fishing effort and other marine users may relocate, ensuring that the potential human safety implications of activity displacement are fully evaluated.

Impact on Phytoplankton Growth and Primary Production

Phytoplankton form the foundation of the marine food web and play a vital role in oxygen production and the uptake of atmospheric carbon dioxide (COâ„‚). Although essential to healthy marine ecosystems, excessive phytoplankton growth can also contribute to harmful algal blooms [1]. Offshore wind farms may influence phytoplankton productivity through multiple pathways, including changes to turbulence, stratification, sediment resuspension and nutrient availability, with the potential to both enhance and reduce primary production at local and regional scales [1,10,11].

Recent research indicates that plankton abundance across the Northeast Atlantic is in decline, with shelf habitats in the Celtic Seas identified as being in particularly poor condition [12]. This underlines the importance of understanding any additional pressures of the Proposed Development on primary production within the wider marine ecosystem.

The EIA acknowledges that the Proposed Development may alter turbidity, sediment transport, water-column stratification and vertical mixing. However, these physical changes are assessed only indirectly in relation to phytoplankton, and no modelling is presented to evaluate how changes in light availability, nutrient dynamics or mixing may influence phytoplankton productivity or primary production at an ecosystem scale [13].

The Applicant states that the Proposed Development will make a significant contribution towards Scotlandâ€™s and the UKâ€™s Net Zero objectives, with estimated annual carbon savings of millions of tonnes of COâ„‚ [14]. In this context, it is notable that the EIA does not include a baseline characterisation of phytoplankton productivity or an assessment of how the Proposed Development may affect this fundamental component of marine carbon cycling and ecosystem functioning.

Given the scale of the Proposed Development and the recognised importance of phytoplankton to both biodiversity and climate regulation, this omission represents a material gap in the assessment. A more robust evaluation of potential effects on phytoplankton productivity and the wider ecosystem should therefore be provided before the application is determined.

Leading-Edge Erosion of Turbine Blades

Leading-edge erosion, caused by the repeated impact of raindrops and airborne particles on turbine blade coatings, becomes increasingly significant as blade lengths and tip speeds increase [1]. With a proposed rotor diameter of up to 290 m [15], the Proposed Development is likely to experience substantial leading-edge erosion during its operational lifetime [16].

Leading-edge erosion has both environmental and operational implications. Degradation of blade coatings can result in the release of microplastic particles to the marine environment, while also reducing aerodynamic efficiency, increasing

maintenance requirements and shortening turbine blade lifespan.

Research has shown that the higher wind speeds and precipitation experienced in the northeastern North Sea accelerate coating degradation, reducing blade lifetimes by approximately 20% compared with the southwestern North Sea [16]. As the west coast of northern Scotland is more exposed to rain-bearing westerly winds during winter storms than the North Sea [17], erosion rates may be greater still for the Proposed Development. Given the anticipated 35 years of operational lifetime of the wind farm [3], even relatively small annual losses of blade coating material could result in substantial cumulative releases of microplastics over the lifetime of the project.

Despite these considerations, the publicly available planning documents do not include a specific assessment of leading-edge erosion or its potential consequences, including microplastic emissions, reduced turbine efficiency, increased maintenance vessel traffic and shortened turbine lifespan. These matters are relevant to both the environmental effects and long-term operational performance of the Proposed Development, yet they are not explicitly considered within the EIA. The Applicant should therefore demonstrate how leading-edge erosion has been considered and assess its likely environmental and operational implications over the lifetime of the project.

Pollution from Corrosion Protection Systems

Corrosion protection systems are required to prevent the degradation of offshore wind turbine foundations and associated steel structures, both above and below the waterline. Sacrificial anodes and other cathodic protection systems can release trace metals into the marine environment throughout the operational life of a wind farm, with the potential for cumulative environmental effects [1,18].

Despite the widespread use of these systems in offshore wind developments, the EIA does not assess the potential environmental impacts of trace metal emissions from corrosion protection, nor does it describe the corrosion protection methods proposed for the Proposed Development. It also does not consider whether alternative corrosion protection strategies or mitigation measures, such as those proposed by WatsonÂ *et al.*Â [19], could reduce trace metal inputs to the marine environment.

Given the scale and anticipated operational lifetime of the Proposed Development, the omission of this assessment represents a material gap in the EIA. The Applicant should therefore provide details of the proposed corrosion protection systems, estimate the likely quantities of trace metals released over the lifetime of the project, and assess the effectiveness of available mitigation measures before consent is granted.

Underwater Infrasound

The inclusion of infrasound within the Applicantâ€™s underwater noise modelling is a positive aspect of the EIA [20], as frequencies this low are not routinely considered in offshore wind assessments. Infrasound, defined as sound below 20 Hz and below the threshold of human hearing, can propagate over hundreds of kilometres in the marine environment [21] and therefore has the potential to extend well beyond the Offshore Development Area.

Many marine organisms, including low-frequency hearing cetaceans, teleost fish and marine invertebrates such as cephalopods and jellyfish, rely on sound within this frequency range for essential biological functions, including navigation, foraging, communication, reproduction and predator avoidance [21].

The underwater noise modelling identifies impact piling as the activity with the greatest potential to cause injury, predicting the onset of Permanent Threshold Shift (PTS), that is irreversible hearing damage, in low-frequency cetaceans, including minke whale, over distances of up to 27 km. The predicted impact range is estimated to reduce to approximately 2.1 km with mitigation measures such as bubble curtains [20].

While the EIA appropriately identifies PTS as a form of physical injury, it does not adequately assess the ecological consequences of permanent hearing impairment beyond the individual animal. In particular, the assessment does not evaluate how irreversible hearing loss could affect survival, foraging success, navigation, reproductive success or population dynamics in vulnerable cetacean populations.
In addition, the assessment gives limited consideration to uncertainties regarding the sensitivity of other marine taxa to low-frequency sound [21]. Given these uncertainties, and the distances over which infrasound can propagate, the ecological implications of underwater infrasound warrant a more comprehensive assessment before the application is determined.

Moving Underwater Shadows

The potential effects of visual stimuli generated by offshore wind turbines on aquatic species remain poorly understood, and the underlying physical processes are still being investigated. Recent research indicates that, contrary to assumptions commonly applied in offshore wind EIAs, lensing by surface waves can intensify rather than attenuate the contrast of turbine blade shadows penetrating the water column [1].

The Windfarm Development Area may intersect migratory routes used by species such as Atlantic salmon. However, the marine ecology chapters do not consider whether moving subsurface shadows or other visual stimuli generated by rotating turbine blades could influence the behaviour of fish, marine mammals or other visually sensitive marine species [22]. Nor does the EIA provide a clear justification for scoping this potential impact pathway out of the assessment.

Although the ecological significance of these visual effects remains uncertain, scientific uncertainty alone does not justify their exclusion from assessment where a plausible mechanism has been identified. In the absence of a robust evidence base demonstrating negligible effects, the omission of this pathway introduces uncertainty into the assessment of ecological impacts.

The Applicant should therefore justify the decision to scope out moving underwater shadows and associated visual stimuli or, alternatively, provide an assessment of their potential effects on relevant marine receptors informed by the current state of scientific knowledge. Given the recognised uncertainty surrounding this emerging field of research, a precautionary approach should be adopted to ensure that potentially significant effects on fish, shellfish and marine mammal receptors have been adequately considered before the application is determined.

Changes to Physical and Coastal Processes

The EIA assesses the effects of the Proposed Development on the marine physical environment using MIKE hydrodynamic models. These models simulate turbineâ€“water interactions, including the influence of fixed foundation structures on waves and currents, such as the blocking effect of monopile foundations on wave propagation [23]. On this basis, the EIA concludes that the Proposed Development would result in no more than minor adverse effects (not significant in EIA terms) on physical and coastal processes [3].

However, the modelling does not account for the influence of the wind farm on near-surface wind fields. Large offshore wind arrays are known to modify wind speed and turbulence through wake effects, with changes extending over considerable distances downstream. These atmospheric changes can influence airâ€“sea exchange processes, including wind stress, wave generation, vertical mixing and stratification, with potential consequences for sediment transport, primary production and bottom-water deoxygenation beyond the Windfarm Development Area and the Zone of Influence considered in the EIA [11,24,25].
The modelling therefore assumes that the Proposed Development alters the marine environment only through direct turbineâ€“water interactions and does not modify the atmospheric forcing that drives the marine system [23]. This represents an important limitation of the assessment, as it excludes a plausible impact pathway that could influence both the magnitude and spatial extent of environmental change.
The Applicant should therefore explicitly acknowledge and justify this modelling assumption and explain why the omission of wind-farm-induced atmospheric effects does not affect the conclusions of the EIA. In the absence of such justification, the conclusions regarding physical and coastal processes remain subject to significant uncertainty.

Wind Wake Effects on Neighbouring Wind Farms

The submitted application does not assess the potential aerodynamic interactions between the Proposed Development and existing or planned wind farms. It is well established that wakes generated by large offshore wind arrays can extend for more than 100 km downstream, reducing wind speeds and potentially decreasing the energy yield of neighbouring wind farms by several tens of percent under certain atmospheric conditions [1,26]. These interactions, commonly referred to as wind wake effects or â€œwind theftâ€ , may therefore have material operational and economic consequences for other renewable energy developments.

There is potential for wake interactions between the Proposed Development and nearby offshore developments, such as the planned Malin Sea Wind floating offshore wind farm [27], as well as onshore wind farms located downwind of the prevailing south-westerly winds [17], including developments on the Kintyre peninsula [28]. Despite this, the EIA does not assess the potential extent or significance of these cumulative interactions.

The omission is particularly noteworthy given that the UK Government promotes a â€œgood neighbourâ€ approach. Their guidance states that developers of incoming offshore wind farms are strongly encouraged to undertake a wake assessment to understand the impact of their development on nearby offshore wind farms [29]. Despite this, the Applicant has not assessed the potential for wake interactions with neighbouring offshore or onshore wind

developments. In this context, the absence of any assessment of wind wake effects represents a material gap in the information supporting the application.

The Applicant should therefore assess the potential for wind wake interactions with existing, consented and reasonably foreseeable offshore and onshore wind energy developments, and demonstrate that any material operational or economic effects have been appropriately considered before the application is determined.

Economic and Social Impacts

The economic viability of the Proposed Development warrants further scrutiny. Work on the West of Orkney Wind Farm has reportedly been paused due to the exceptionally high cost of grid connection, with transmission charges identified as among the highest in northern Scotland [30]. This raises legitimate questions regarding the financial viability of comparable offshore wind developments requiring similar new transmission infrastructure, including the Proposed Development, which is anticipated to connect to the grid in South Ayrshire [3]. These uncertainties should also be considered alongside the significant system constraint costs associated with integrating offshore wind generation in northern Scotland [1].
The Applicant acknowledges that there is currently insufficient information regarding the grid connection and associated onshore transmission infrastructure to enable an assessment of the combined effects of the offshore and onshore elements of the project. Consequently, the EIA does not assess the Proposed Development as a complete project [14]. As a result, the full economic and social implications arising from the associated transmission infrastructure have not been evaluated within the current application.

According to Iona Community Council, despite nearly two years of interaction with the developer, it has been difficult to obtain a clear picture of the scale, impacts, costs and benefits of the Proposed Development [31]. Their consultation with the island community on the Proposed Development revealed that only 3% of the consulted households supports the proposal. Contemplation should also be given to the potential effects on community wellbeing and social cohesion where major developments give rise to sustained community conflict or division [32].

In light of these matters, it is considered that the Application does not provide a sufficiently comprehensive assessment of the economic and social implications of the Proposed Development. A more detailed evaluation of economic viability, cumulative costs, and the social impacts associated with both the offshore and onshore components should be undertaken before any decision on consent is made.

Decommissioning

Environmental Impacts and Sustainability

The EIA states that structures above the seabed will be removed at the end of the operational life of the Proposed Development but provides limited clarity regarding the extent of infrastructure that will remain in situ [33]. The Proposed Development includes three potential foundation types which differ significantly in their seabed penetration depths and physical footprints [33]. However, the EIA does not clearly identify the extent to which these substructures, or associated infrastructure, would be removed during decommissioning.

Similarly, the long-term management of associated components, including corrosion protection systems attached to steel structures, is not adequately addressed. Where partial removal of foundations is proposed, substantial infrastructure may remain embedded within the seabed for the foreseeable future, with potentially significant long-term environmental implications. In the absence of detailed assessment, the residual effects of such an approach remain uncertain.

The EIA also provides no clear strategy for the management of turbine blades at the end of their operational life. Turbine blades are manufactured from composite materials that are widely recognised as being difficult to recycle, with landfill disposal and incineration representing a significant end-of-life pathway [34].
The absence of a defined decommissioning and waste management strategy creates uncertainty regarding the long-term environmental effects of the Proposed Development. This approach appears inconsistent with the principles of the waste hierarchy established under the Waste (Scotland) Regulations 2012 [35], which require priority to be given to waste prevention, reuse, recycling and recovery before disposal, and with Scotlandâ€™s wider circular economy objectives.
Accordingly, the Planning Authority and Scottish Ministers are respectfully requested to consider whether the proposed decommissioning strategy has been assessed in sufficient detail. Clarification should be required regarding the extent of infrastructure proposed to remain in situ, the environmental consequences of partial removal, and the Applicantâ€™s strategy for managing turbine blades and other difficult-to-recycle materials in accordance with circular economy

principles before any consent is granted.

Financial Liabilities

The adequacy of financial provision for decommissioning also requires careful consideration. Research undertaken by the Netherlands Organisation for Applied Scientific Research (TNO) indicates that decommissioning costs for a 2 GW offshore wind farm could be approximately â‚¬100 million higher than previous estimates [36]. Although partial removal of infrastructure may reduce costs, this approach may not necessarily represent the most environmentally appropriate option and should not be adopted solely based on financial considerations.
There is also increasing concern regarding decommissioning liabilities across the UK offshore wind sector. Evidence suggests that some operators may not be making financial provision in accordance with Government expectations for meeting end-of-life obligations, creating a potential risk that future decommissioning liabilities could ultimately fall upon the public purse [37].

Reflecting on these uncertainties, it is respectfully submitted that any consent granted for the Proposed Development should be subject to robust planning conditions or legally enforceable obligations requiring the Applicant to establish, maintain and periodically review ring-fenced financial security sufficient to meet the full costs of decommissioning and site restoration. Such financial security should remain in place throughout the operational life of the project and be secured well in advance of the expiry of any subsidy support or anticipated decommissioning period.

Mental Health and Wellbeing

Uninterrupted vistas, expansive open spaces, long views to the horizon, and dark night skies are widely recognised as contributing to health and wellbeing by providing emotional, psychological and physical benefits. These benefits are particularly associated with landscapes and seascapes that remain unspoilt, tranquil, and relatively free from large-scale development [1].

Scotlandâ€™s west coast and the Hebridean islands are renowned for their scenic beauty, remoteness and tranquillity, attracting residents and visitors seeking recreation, reflection and respite. For over 1,400 years, Iona and the surrounding islands have welcomed Christian pilgrims and today continue to attract people of many faiths and none seeking spiritual renewal, contemplation and wellbeing [38]. The introduction of a large-scale industrial development would erode the remoteness and tranquillity that underpin the areaâ€™s cultural, spiritual and recreational significance.

The EIA identifies significant visual effects from viewpoints on Colonsay, Oronsay, Islay, Jura, Mull and Iona, together with effects on sections of the Argyll coastline and ferry routes. It also recognises adverse effects on landscape character, coastal character and recognised landscape qualities [39].

However, despite acknowledging these significant changes to the landscape and seascape, and their effects on tourism, the EIA does not evaluate the potential implications for mental wellbeing, sense of place, or the emotional and cultural connections that individuals and communities have with valued landscapes and seascapes [40], for example as presented by the cultural initiativeÂ *Hebridean Horizons*Â [41].

Scottish Planning Policy recognises that the quality and character of Scotlandâ€™s landscapes contribute to community health and wellbeing [42]. These are material planning considerations where significant changes to valued landscapes are proposed. In addition to the physical environmental effects identified in the EIA, the Planning Authority and Scottish Ministers are respectfully requested to consider the cumulative effects of the Proposed Development, including both its offshore and onshore components, on landscape and seascape, the wellbeing benefits they provide, and the sense of place experienced by residents and visitors.

Concluding Remarks

The matters set out above indicate that the publicly available project documentation does 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 adequately addressed.

Given the scale, complexity, and cumulative nature of the Proposed Development, together with the acknowledged uncertainties identified throughout the planning application documents, it is considered that the information currently available is insufficient to support an informed determination.

For these reasons, consent should not be granted based on the current application. The Applicant should instead be

required to provide further assessment and evidence to address the matters identified in this objection before the Proposed Development is taken forward.

Thank you for your attention to this objection.

Best wishes

[Redacted]

REFERENCES

1. Goddijn-Murphy, L.M. (2026). 10 Things to consider before approving another offshore wind farm: A case study for Highland, Scotland.Â *Ocean Coast. Manag*. Volume 271, 107956;Â https://doi.org/10.1016/j.ocecoaman.2025.107956
2. The Scottish Association for Marine Science (2025. The Ocean Enters the Boardroom Available online:Â https://www.sams.ac.uk/news/sams-news-ocean-on-the-boardÂ (Accessed 20 Jul 2026).
3. ScottishPower (2026). Windfarm Development Area. Environmental Impact Assessment Report â€“ Non-Technical Summary. Available online:Â https://marine.gov.scot/sites/default/files/non_technical_summary_4.pdfÂ (Accessed 29 June 2026).
4.Â North Sea Energy (2024). Use of Spaceâ€"North Sea Energy. Available online:Â https://northseaenergyroadmap.nl/use-of-spaceÂ (Accessed on 29 June 2026).
5.Â ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 21 Major Accidents and Disasters. Available online:Â https://marine.gov.scot/sites/default/files/chapter_21_major_accidents_and_disasters.pdfÂ (Accessed 17 Jul 2026).
6.Â Royal Navy News (2025). Royal Navy monitors Russian activity in UK waters. Available online:Â https://www.royalnavy.mod.uk/news/2025/may/29/20250529-royal-navy-monitors-russian-activity-in-uk-watersÂ (Accessed 20 Jul 2026).
7. BBC News (2025). How serious is the Russian spy ship move? Available online:Â https://www.bbc.co.uk/news/articles/c4gpgj6d4e6oÂ (Accessed 20 Jul 2026).
8.Â BBC News (2026). Chinese firmâ€™s Highland port plans blocked by UK government. Available online:Â https://www.bbc.co.uk/news/articles/c995xjxk97moÂ (Accessed 20 Jul 2026).
9. East Lothian Courier (2015). Port Seton fishermen fear for lives from unexploded bombs. Available online:Â https://www.eastlothiancourier.com/news/25054490.port-seton-fishermen-fear-lives-unexploded-bombs/Â (Accessed 20 Jul 2026).
10.Â Sealetters (2025). Save the Phytoplankton. Available online:Â https://sealetters.substack.com/p/fight-for-phytoplanktonÂ (Accessed 20 Jul 2026).
11.Â Daewel, U., Akhtar, N., Christiansen, N.Â *et al.*Â (2022) Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea.Â *Commun. Earth Environ.*, 3, p. 292;Â https://doi.org/10.1038/s43247-022-00625-0
12. Plymouth Marine Laboratory (2026). Decline in plankton across North East Atlantic sends stark warning for ocean health | LinkedIn. Available online:Â https://www.linkedin.com/pulse/decline-plankton-across-north-east-ogvpe/Â (Accessed on 21 Jul 2026).
13.Â ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 7: Marine Physical Environment. Available online:Â https://marine.gov.scot/sites/default/files/chapter_7_marine_physical_environment.pdfÂ (Accessed on 20 Jul 2026).
14.Â ScottishPower (2026). MachairWind Offshore Windfarm Chapter 1 Introduction. Available online:Â https://marine.gov.scot/sites/default/files/chapter_1_introduction_3.pdfÂ (Accessed on 20 Jul 2026).
15.Â ScottishPower (2025). MachairWind Offshore Windfarm. Windfarm Development Area. Information Booklet: Autumn 2025. Available online:Â https://www.scottishpowerrenewables.com/documents/d/guest/MachairWind-Information-Booklet-Autumn-2025Â (Accessed on 20 Jul 2026).
16. TNO (2025). Better damage prediction for offshore wind turbine blades. Available online:Â https://www.tno.nl/en/newsroom/2025/03/damage-prediction-wind-turbine-blades/Â (Accessed 20 Jul 2026).
17.Â Met Office (2025). Northern Scotland: climate. Available online:Â https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/weather/learn-about/weather/regional-climates/northern-scotland_-climate-met-office.pdfÂ (Accessed 20 Jul 2026).
18.Â Sealetters (2025). Wind Farming. Available online:Â https://sealetters.substack.com/p/wind-farmingÂ (Accessed 20 Jul 2026).

19. G.J. Watson, G. Banfield, S.C.L. Watson,Â *et al*. (2025). Offshore wind energy: assessing trace element inputs and the risks for co-location of aquaculture.Â *npj Ocean Sustain*, 4, p. 1;Â https://doi.org/10.1038/s44183-024-00101-6
20.Â ScottishPower (2026). MachairWind Offshore Development: Appendix 10.1 Underwater Noise Modelling Report. Subacoustech Environmental Report No. P312R0103. Available online:Â https://marine.gov.scot/sites/default/files/appendix_10.1_underwater_noise_modelling_report.pdfÂ (Accessed on 20 Jul 2007).
21.Â Duarte C. M.Â *et al.*Â (2021). The soundscape of the Anthropocene Ocean.Â *Science*Â 371, eaba4658.Â https://doi.org/10.1126/science.aba4658.
22.Â Williamson, B.J., Goddijn-Murphy, L., McIlvenny, J., Youngson, A. (2024). Potential exposure of aquatic organisms to dynamic visual cues originating from aerial wind turbine blades.Â *Fishes*, 9(12), 482;Â https://doi.org/10.3390/fishes9120482.
23. Haskoning (2025). Appendix 7.1 - Marine Physical Environment Numerical Modelling. Available online:Â https://marine.gov.scot/sites/default/files/appendix_7.1_marine_physical_environment_numerical_modelling.pdf. (Accessed on 20 Jul 2026).
24.Â Sauvage, C., Seo, H., Zippel, S., Clayson, C. A., & Edson, J. B. (2025). Fetch-dependent surface wave responses to offshore wind farms in the Northeast U.S. Coast.Â *Journal of Geophysical Research: Oceans*, 130, e2025JC023156.Â https://doi.org/10.1029/2025JC023156
25.Â Gautier, C., Emmanouil, A., Leummens, L. (2025). First Steps to Assess How Offshore Wind Farms Affect Waves and Currents. Document ID 11210382-001-HYE-0001. Version 2.0. Available online:Â https://publications.deltares.nl/11210382_001_0001.pdfÂ (Accessed on 20 Jul 2026).
26.Â Sealetters (2025). Wind Wars. Available online:Â https://sealetters.substack.com/p/wind-warsÂ (Accessed 20 Jul 2026).
27. ESB (2024). Welcome to Malin Sea Offshore Wind. Available online:Â https://malinseaoffshorewind.com/homeÂ (Accessed on 20 Jul 2026).
28. NatureScot (2026). NatureScot GIS data viewer. Available online:Â https://ogc.nature.scot/geoserver/www/maps/naturescot-data-viewer.html?layer=renewables:windfarmÂ (Accessed on 20 Jul 2026).
29. UK Government (2025). Draft: Supplementary guidance for renewable energy infrastructure (EN-3): Offshore wind wake effects (accessible webpage). Available online:Â https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-2025-revisions-to-national-policy-statements/outcome/draft-supplementary-guidance-for-renewable-energy-infrastructure-en-3-offshore-wind-wake-effects-accessible-webpageÂ (Accessed on 20 Jul 2026).
30. BBC News (2026). Plans for huge wind farm paused over â€˜unfairâ€™ grid charges. Available online:Â https://www.bbc.co.uk/news/articles/c8x919v8g19oÂ (Accessed on 20 Jul 2026).
31.Â Iona Community Council (2026). Proposed MachairWind Offshore Wind Farm. Updated note (v.2). Available online:Â https://tireecommunitycouncil.co.uk/wp-content/uploads/2026/05/Iona-brief-MachairWind-v2.pdfÂ (Accessed on 20 Jul 2026).
32.Â Browne, G.R., Leckey, M. (2022). Social cohesion and local democracy as determinants of health: Testing the liveability framework for health impact assessment of a major infrastructure,Â *Environmental Impact Assessment Review*, Volume 96, 2022,106817.Â https://doi.org/10.1016/j.eiar.2022.106817.
33.Â ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 3 Project Description. Available online:Â https://marine.gov.scot/sites/default/files/chapter_3_project_description.pdfÂ (Accessed on 20 Jul 2026).
34.Â Li, L, Kang, X. (2025). Recycling wind turbine blades: A comprehensive review of challenges, solutions, and future directions,Â *Journal of Building Engineering*, Volume 114, 114489,Â https://doi.org/10.1016/j.jobe.2025.114489.
35.Â UK Government (2012). The Waste (Scotland) Regulations 2012. Available online:Â https://www.legislation.gov.uk/ssi/2012/148/contentsÂ (Accessed on 20 Jul 2026).
36.Â TNO (2025). Offshore Wind Farm Decommissioning Cost Estimates. TNO 2025 R11554. Available online:Â https://publications.tno.nl/publication/34645671/lokAEuCy/TNO-2025-R11554.pdf /Â (Accessed on 20 July 2026).
37.Â Eigen VaÎ»ues (2025). Offshore Wind Decommissioning Timebomb. Available online:Â https://davidturver.substack.com/p/offshore-wind-decommissioning-timebombÂ (Accessed on 20 Jul 2026)
38.Â Historic Environment Scotland (2026). Iona Abbey | Historic Scotland. Available online:Â https://www.historicenvironment.scot/visit/all/iona-abbey-and-nunnery/Â (Accessed on 20 Jul 2026).
39. Scottish Power (2026). MachairWind Offshore Windfarm. Chapter 16 Seascape, Landscape and Visual Impact Assessment. Available online:Â https://marine.gov.scot/sites/default/files/chapter_16_seascape_landscape_and_visual_impacts.pdfÂ (Accessed on 20 Jul 2026).
40. ScottishPower (2026). MachairWind Offshore Windfarm. Chapter 18 Socio-economics. Avaialble online:Â https://marine.gov.scot/sites/default/files/chapter_18_socio-economics.pdfÂ (Accessed on 20 Jul 2026).
41. KNOCKvologan (2026). Hebridean Horizons. Available online:Â https://knockvologan.net/studies-projects/2021/12/11/hebridean-horizonsÂ (Accessed on 20 Jul 2026).
42. Scottish Government (2023). National Planning Framework 4. Available

online:Â https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4.pdfÂ (Accessed on 20 Jul 2026).

Member of the Public 4982

From: [Redacted]
To: MD Marine Renewables
Subject: Machair Wind Farm Development , Argyll and Bute
Date: 14 August 2026 14:14:51

Dear Sir/Madam

Reference number: 00012385/ 00012386

I am a regular visitor to Iona and Mull. I am writing to OBJECT to the above proposal for a wind farm off Colonsay and Iona, for which consent has been applied under S 36 of the Electricity Act 1989. I very much hope that a full public enquiry will be held, given the importance and delicate balance of the site.

My objection is based on
(a) disruption to heritage assets and
(b) adverse visual impact on sensitive seascapes.
Both of these are protected matters under the Local Development Plan of the Argyll and Bute Council.

In relation to heritage assets, Iona is a world-renowned cultural site of supreme importance to religious history. Although not formally inscribed as a World Heritage Site, it should be considered to be on a par, in terms of planning protection, with those Scottish cultural sites which are so inscribed (eg the Neolithic core of Orkney and Edinburgh Old and New Towns). UNESCO and ICOMOS should be consulted, as it is arbitrary to distinguish on the basis of a formal designation, especially in relation to a site like Iona, which has a strong claim to inclusion on the list, and may be so included in the near future.

The culturally significant site of Iona is not only the limited area around the Abbey, the Reilig Odhrain and the Nunnery, but extends to the whole island, on which there are important pilgrimage routes. The most important of these leads to St Columba's Bay, where he is believed to have landed in 563 AD. This is on the south of the island and the proposed wind farm would be in full view. The wild and open aspect of the direction from which he landed (from Ireland) is part of the spirit of the place.

The other heritage asset worthy of consideration is Staffa (Fingal's Cave). Its extraordinary natural rock formations have inspired generations of composers, writers and artists. It is also, together with the Treshnish islands, home not only to puffins, but to a wide variety of sea birds, some of which could be affected by the very large wind turbines.

In the other direction, the seascapes around Jura, Colonsay and Islay will be adversely affected. The sheer size of the proposal is a vast affront to the Inner Hebrides, and constitutes an unacceptable development and Intrusion into the balance of seascape, rocks, mountain views, history, archaeology and art.

Yours sincerely

[Redacted]

Sent from my iPhone

Member of the Public 4983

From:	**[Redacte**
To:	MD Marine Renewables
Subject:	Objection to the Machair Wind Project
Date:	15 August 2026 15:17:43

Dear Sir or Madam,

I am writing in a personal capacity as a resident of the Isle of Mull to object to the Machair Wind Project which has been proposed for the seas of the Inner Hebrides.

(I have also submitted an objection on behalf of the Mull Wildlife Group, as the Group's chair.)

I support and understand the need for renewable power but the sheer scale of the current proposal would have a huge and unacceptable impact on the local environment, wildlife and economy in an area that relies on tourism and fishing for much of its income and employment.

I note that the interactive map of the proposals fails to show the islands of Lunga and Staffa, the latter a huge draw for tourists from all over the world wanting to see puffins and visit Fingal's Cave. It suggests that those planning the project haven't visited the area and haven't done much research.

In addition to the destruction of habitats for marine wildlife, and the difficulty that migrating birds would have in negotiating a 448km^2 site (half the size of the Isle of Mull!) filled with more than ninety 280m+ tall turbines, the sound of them would be distracting for both wildlife and people. The location off the west coast of our islands means that the world famous sunsets and dark sky views of the Milky Way, would be forever spoiled by the lights on the tops of such tall structures.

To lay the foundations for, construct, and install more than ninety of the tallest offshore wind turbines in the UK (and Europe?) in a virtually pristine environment seems to be nothing more than an act of industrial vandalism.

My understanding is that the turbines would be built in China, the company whose shareholders would profit is Spanish, and the power produced is to supplement Welsh supplies. Scotland is already a net-exporter of wind-power, and suppliers are even paid sometimes to ‘turn off’ the turbines. How would building more here reduce global warming?

I believe that more investment and energy needs to go into tidal power; there are four tidal movements daily - guaranteed!

Please reject these plans.

Yours aye,
[Redacted]

Member of the Public 4984

To: Marine Directorate Licensing Operations Team / Scottish Government Energy Consents Unit
Regarding: Formal Objection to the MachairWind Offshore Wind Farm Proposal
From:
[Redacted]

19th July 2026

To Whom It May Concern,

I am writing as a long-term property owner on the Isle of Colonsay to register my strongest formal objection to the proposed MachairWind offshore wind farm development by ScottishPower Renewables / Iberdrola.

While I understand the need for green energy, the immense physical footprint and close proximity of this specific development pose a direct, devastating threat to our self catering business, my property, and the globally significant wildlife populations that rely on Colonsay's unique ecosystem. I object to the project based on the following critical points:

- **Direct Economic Damage to a Established Tourism Business**: For the past 14 years, our property has been operating successfully as a holiday letting business, bringing over 200 visitors to Colonsay every single year. These visitors travel here explicitly to experience the pristine, untouched coastlines and natural tranquillity of the Inner Hebrides. Introducing a massive, industrial-scale wind farm into this fragile ecosystem directly threatens our ability to attract visitors in the future, with the knock on to local hospitality employment and the local businesses which benefit from tourism spend. The wider island economy relies hugely on tourism which allows the island to sustain a viable permanent population and keep the island primary school open (currently school numbers are only 3 children).
- **Severe Visual Intrusion on Direct Sea Views**: My property commands direct, uninterrupted sea views. The placement of industrial turbines standing up to 340 metres tall on our horizon will entirely obliterate this natural landscape. Furthermore, the mandatory high-intensity red aviation lights flashing through the night will permanently destroy Colonsay's famous dark-sky environment, severely diminishing the quality of life for residents and the primary appeal for eco-tourists. The visual destruction will extend to some of the most widely visited places on Colonsay such as Ardskenish, Machrins, Dun Gallain (ancient Iron Age promontory fort) Colonsay Golf Course and the important sea bird breeding cliffs at Pigs Paradise.

- **Catastrophic Impact on the Southern Hebrides' Largest Seabird Colony**: The proposed wind farm sits just 7 miles from the cliffs at **Pigs Paradise**, which host the largest seabird breeding colony in the Southern Hebrides. Placing towering, high-speed rotating turbine blades within the immediate feeding and flight paths of this critical colony will have a devastating effect. The cumulative threat of blade collisions, alongside subsea construction noise displacing sand eels and other vital food sources, risks the total collapse of this regionally significant avian population.
- **Severe Threat to the Endangered Corncrake**: Colonsay and Oronsay are famous as vital strongholds for the highly endangered **Corncrake**. These rare birds migrate directly through the proposed MachairWind development zone to reach their breeding grounds on our islands. Erecting an extensive wall of 340-metre-tall turbines directly in their established migratory path introduces an unacceptable risk of collision mortality, directly undermining decades of intensive, taxpayer-funded conservation efforts on Colonsay.

The environmental and economic costs of the MachairWind project are entirely disproportionate. It places the burden of industrialization squarely onto a fragile island community and irreplaceable wildlife habitats, with no tangible local benefit.

I urge the Marine Directorate and Scottish Ministers to protect the natural heritage of the Inner Hebrides and refuse consent for this development.

Please acknowledge receipt of this objection and ensure I am kept informed of all future stages of the planning and consultation process.

Yours faithfully,

[Redacted]

Member of the Public 4985

From: [Redacted]
To: MD Marine Renewables
Subject: Machairwind ref00012385
Date: 14 August 2026 15:59:09

What on earth are you trying to do ? Put a propellor nation of turbines anywhere near Iona would be sacrilege and a blatant mistake made by those who have no idea of what Iona stands for ..
All the powers seem interested in is the results and the Economic advantages …You should understand that there are some places on this planet that should not be tampered with and left alone ….Iona is one of them !!!!!
You can ask me what my own association is with the island …
I was bought up there … I'm a crofter boy who knows every stone … and I can tell yer, they've already taken its soul by putting houses everywhere !! But I quote
The immortal words of the bard …

'Iona of my heart Iona of my love instead of monks voices shall be the lowing of cattle … but ere the world shall come to an end .. Iona will stay as it is !!!!' …

For goodness sake I urge you to rethink your strategy here ….

[Redacted]

Sent from my iPhone

Member of the Public 4986

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Formal objection to the Section 36 consent and marine licence applications for the MachairWind Offshore Windfarm
Date:	25 July 2026 22:02:55

To: Scottish Ministers, Marine Directorate – Licensing Operations Team
Email: MD.MarineRenewables@gov.scot

Formal objection to the Section 36 consent and marine licence applications for the MachairWind Offshore Windfarm

Dear Sir or Madam,

I am writing as a resident of the Isle of Mull to object formally to the applications submitted by MachairWind Limited for the proposed MachairWind Offshore Windfarm.

I support the transition from fossil fuels to renewable energy and recognise the urgent need to address climate change. My objection is not to offshore wind power in principle. It concerns the scale, location and likely consequences of this particular development, together with serious questions about whether its environmental, cultural and socioeconomic effects have been assessed adequately.

MachairWind would introduce up to 144 exceptionally large turbines into one of Scotland's most distinctive and least industrialised Atlantic seascapes. The development area extends over approximately 448 square kilometres. The turbines could reach approximately 335 metres above sea level and would be situated around 20 kilometres from parts of Mull and Iona and considerably closer to Colonsay.

This is not a modest offshore development on a remote horizon. It would be a major industrial installation, visible across an extensive part of the Inner Hebrides and affecting places whose landscape, cultural history, wildlife and visitor economy are of national and international importance.

Seascape, landscape and visual effects

The proposed development would fundamentally alter the character of the seascape south and west of Mull and Iona.

This landscape is defined by open water, uninterrupted horizons, changing light and weather, and the visual relationships between Mull, Iona, Staffa, Colonsay, Islay and the smaller islands. Its value cannot be measured simply by calculating the apparent height of individual turbines or their distance from selected viewpoints. Its significance lies in the character of the whole seascape and in the rarity of extensive maritime horizons that remain substantially free from industrial infrastructure.

The proposal would introduce repeated vertical structures across a wide arc of the horizon. The turbines would be visible during the day and would require aviation and navigational lighting at night. The result would be a permanent engineered presence in a landscape presently characterised by its natural scale, darkness and sense of remoteness.

The visual effects would be especially serious when experienced from Iona, the Ross of Mull, Staffa and other islands and coastal locations. They would also affect people travelling through the seascape by ferry and smaller vessels. Such journeys are an important part of how the Inner Hebrides are perceived and experienced; they should not be treated as incidental or transitory viewpoints.

I am concerned that conventional panoramic visualisations can make offshore turbines appear smaller and less prominent than they are likely to seem to the human eye. That concern becomes particularly important where turbines of an unprecedented or near-unprecedented height are proposed relatively close to land.

The Scottish Ministers should not rely on a limited selection of developer-chosen viewpoints or visualisations. Before consent can be considered, there should be independently verified visual representations from all

affected communities and significant locations, including representative viewpoints on the Ross of Mull, Iona, Staffa and the principal sea routes. These should show clear daylight, poor visibility, dawn, dusk and night-time lighting conditions.

The absence of development on the present horizon is itself a landscape characteristic. The assessment should therefore address the loss of that undeveloped character, rather than treating the effect solely as the visibility of individual turbines at a given distance.

Iona and the cultural landscape of the Inner Hebrides

Iona is not merely another visual receptor. Its landscape and seascape are inseparable from its cultural, religious and historical importance.

The island has been a place of worship, pilgrimage, burial, learning and cultural memory for approximately 1,500 years. Iona Abbey, the Nunnery, Reilig Odhráin, the historic route known as the Road of the Dead and the island's wider archaeological landscape derive part of their meaning from their physical setting.

That setting includes the relationship between land, sea, sky and the open horizon. It is not confined to the boundaries of individual scheduled monuments or listed buildings.

The introduction of an extensive array of exceptionally tall turbines into this setting risks weakening the qualities of remoteness, contemplation, continuity and spiritual association through which Iona is experienced. The potential effect is not adequately described as a change to a view. It is a change to the setting and meaning of an internationally recognised cultural landscape.

The proposal may therefore cause substantial harm to the setting of nationally important heritage assets. Scottish Ministers should apply the greatest weight to the protection of those assets and their settings and should require a genuinely independent assessment of the cumulative effect on Iona's historic and spiritual landscape.

Effects on tourism and the island economy

Tourism on Mull and Iona depends heavily upon the quality of the natural environment, scenery, wildlife, tranquillity and cultural heritage. These are not peripheral features of the local economy: they are among its principal economic assets.

The effect of MachairWind cannot adequately be assessed by looking only at employment figures around existing windfarms elsewhere. Comparisons with larger mainland economies or places with different landscapes and visitor markets would not capture the vulnerability of small island communities.

Visitors come to Mull, Iona and the surrounding islands specifically to experience wildlife, undeveloped landscapes, open seascapes, cultural heritage, tranquillity and a relative absence of industrial infrastructure. Even a comparatively small change in visitor perceptions or behaviour could have significant consequences for accommodation providers, hospitality businesses, wildlife-tour operators, boat operators, shops, cultural organisations and the many people whose livelihoods depend directly or indirectly on tourism.

I am particularly concerned by the reported absence of meaningful, place-specific research involving Iona's residents, businesses and visitors. Excluding a community because it is considered too small to form a statistically convenient sample is not a sound basis for concluding that significant effects will not occur. Small population size is a source of vulnerability, not a justification for overlooking the community.

Before any decision is made, an independent and locally grounded socioeconomic assessment should examine:

the importance of undeveloped seascapes to the Mull and Iona visitor economy;
visitor motivations and perceptions;
the particular dependence of small island businesses on seasonal tourism;
effects on wildlife and marine-tourism operators;
possible displacement of visitors;
cumulative effects alongside other proposed marine and energy developments; and
whether any claimed employment and supply-chain benefits are specific, deliverable and accessible to the affected island communities.
General aspirations concerning jobs, investment or community benefit should not be treated as equivalent to

secured benefits. Nor can voluntary or unspecified future community payments compensate for unacceptable environmental or heritage harm.

Marine ecology and ornithology

The waters and islands surrounding the development support internationally important seabird populations and a rich marine environment. Potentially affected species include seabirds travelling between breeding colonies and feeding areas, marine mammals, basking sharks, fish and benthic habitats.

The ecological consequences must be assessed across the whole lifespan of the project: survey work, construction, operation, maintenance and decommissioning. Relevant effects include collision risk, displacement from feeding areas, disturbance, underwater noise, changes to habitat, construction traffic and the barrier effect created by a very large turbine array.

Particular care is required in relation to seabird colonies associated with the Treshnish Isles Special Protection Area and other protected sites. The assessment must consider whether birds from protected colonies use or pass through the development area, rather than relying principally on whether the turbines themselves fall within a designated boundary.

Seabird populations are already affected by multiple pressures, including avian influenza, climate-driven changes in food availability, fishing activity and other offshore developments. Against that background, uncertainty should not automatically be interpreted in the developer’s favour.

Where there is reasonable scientific doubt about adverse effects on the integrity of protected sites, consent should not be granted unless the relevant legal tests are demonstrably satisfied.

Cumulative effects and project fragmentation

MachairWind must not be assessed in isolation. Its effects should be considered cumulatively with other existing and proposed offshore windfarms, transmission infrastructure, subsea cables, shipping activity and other marine development around western Scotland.

I am also concerned that the windfarm development area is being considered before the complete export-cable corridor and onshore transmission infrastructure have been brought forward for consent. Although supporting documentation may discuss elements of the wider project, the public does not yet have the opportunity to examine and respond to the complete final development through a single consenting process.

The windfarm, export cables, landfall, substations and grid connection are functionally dependent parts of one project. Scottish Ministers should be satisfied that the environmental consequences of the whole development have been assessed comprehensively and that separate applications do not obscure significant combined or cumulative effects.

Scale, design envelope and unresolved uncertainty

The application appears to retain considerable flexibility over the number, dimensions, design, foundations and precise positions of the turbines and associated infrastructure.

A design-envelope approach should not permit consent to be granted for a project whose final environmental effects cannot yet be known. The assessment must use a clearly justified worst-case scenario for each receptor. The decision-maker and the public should not be required to assume that later design refinement will resolve effects that are presently uncertain.

This is particularly important because of the unprecedented combination of turbine height, number, development area and proximity to sensitive island landscapes. Experience derived from smaller turbines or developments much farther offshore may not provide a reliable guide to the effects of MachairWind.

Community views and environmental justice

The people living closest to the proposal would experience its landscape, ecological and economic consequences, yet the electricity would be exported through infrastructure connecting elsewhere and the level of direct community benefit remains uncertain.

Iona Community Council's consultation reportedly received responses from approximately 64% of island households, with 92% of those respondents supporting an objection. That is unusually strong evidence of local concern and should be given substantial weight. It cannot simply be balanced against general national statements of support for renewable energy.

The fact that local communities support renewable energy in principle makes this opposition particularly significant. It demonstrates that the issue is not resistance to climate action, but whether the transition is being pursued in the right places, at an acceptable scale and with proper regard for those who will bear its consequences.

Conclusion

I do not believe that the applications presently provide Scottish Ministers with an adequate basis for concluding that the likely significant effects of MachairWind have been identified, assessed and mitigated satisfactorily.

In particular, I remain concerned about:

major adverse effects on the seascape and landscape character of the Inner Hebrides;
harm to the setting and cultural significance of Iona;
inadequate place-specific assessment of tourism and island economies;
effects on seabirds, protected sites and the wider marine environment;
cumulative effects with other developments;
the separation of the windfarm from later cable and onshore applications;
uncertainty created by the broad design envelope; and
the absence of clear, proportionate and secured benefits for the communities most affected.
I therefore ask Scottish Ministers to refuse the present applications.

If Ministers are not presently prepared to refuse them, determination should at minimum be suspended until the applicant has supplied the missing evidence, undertaken independent and genuinely place-specific assessments, demonstrated compliance with the relevant habitats and environmental legislation, and allowed affected communities a meaningful opportunity to respond to the complete project.

Please acknowledge this representation and ensure that it is recorded as a formal objection to all relevant MachairWind Section 36 and marine licence applications.

Yours faithfully,

[Redacted]

Member of the Public 4987

[Redacted]

Marine Directorate - Licensing Operations Team
Scottish Government
375 Victoria Road
Aberdeen
AB11 9DB

1 August 2026

To whom it may concern

Objection to Scottish Power Renewables Machair Wind Offshore Windfarm Proposal
MD-00012385 / MD-00012386 (Machair Wind Limited & Machair Wind Offshore Wind Farm)

I am an amateur ornithologist who has visited the islands of Colonsay and Oronsay for over fifty years and co-write the avifauna of these islands (Jardine, Peacock and Fisher, 2017). For this I have been involved in extensive ornithological survey work on the islands (amounting to thousands of hours) and in particular conducted the 2018 Seabird Monitoring Programme Counts used by SLR / Scottish Power Renewables in their Environmental Impact Assessment Report of this proposal. I also have conducted seabird ringing on Colonsay since 1989 and contribute three Re-trapping Adults for Survival projects (two on Guillemots and one on Kittiwakes) to the British Trust for Ornithology and worked alongside the RSPB FAME and STAR projects tracking the movements of seabirds away from the colony during the breeding season (Cleasby *et al*. 2020) and the AUKESTRA project tracking movements outside the breeding season. I am also part of the editorial team of the annual Argyll Bird Report, so have a good working knowledge of the birds of Argyll. I am therefore particularly well qualified to comment on this application. I am not opposed to renewable energy projects and prior to my retirement was involved in the development of proposals and construction of numerous run-of-the-river hydro-electric projects and a number of suitably-sited onshore windfarms. I am writing to object to this proposal on a personal basis.

I have the following comments on the Environmental Impact Assessment Report for this proposal.

1 It contains *errors in the Corncrake population used in the Migratory Collision Risk Modelling*. The Corncrake is a rare and endangered species in the United Kingdom, which is afforded special protection under the Wildlife and Countryside Act. It is notable that the Environmental Impact Assessment Report does not include a Population Viability Assessment for this vulnerable species. The Corncrake population has fluctuated in recent years around 1000 calling males, with 870 reported in Scotland in 2023, mainly in the Hebrides. In 2023, the following number of calling males were reported in Argyll: Tiree (293), Coll (68), Islay (31), Colonsay & Oronsay (18), Iona (15) and Mull (3). [Sources: BTO Birdfacts, Argyll Bird Report 2023]. The population is likely to be around double this number (c 2,000 individuals) and is considerably lower than that quoted in Annex 11.3D by SPR/SLR (16,960).

Corncrakes migrate at night to and from its wintering grounds in Africa at low altitude and is therefore at risk of collision with turbines. While it can be argued that the Corncrakes on Islay, which lies to the south of the proposed windfarm, and on Colonsay and Oronsay, which lies to the east, may not be affected by the proposal, the populations on Iona, Tiree and Coll all lie to the north and the proposal creates a barrier and risk on their migratory route. The Corncrake population on these islands comprise around 40% of the United Kingdom population and those on Tiree and Coll are protected by Special Protection Areas sites on these islands. This excludes populations from the Outer Hebrides which are also likely to pass through the WDA. This suggests that the percentage of the population potentially passing through the WDA is significantly under-estimated (1.99%) by SPR/SLR.

Given these errors, there can be little confidence in the collision risk estimates provided in Annex 11.3D for this protected species and therefore the Environmental Impact Assessment Report is deficient in its assessment of the collision risk to migratory species. This deficiency is grounds for rejection of this proposal.

2 There are *errors in Annex 11.2M Regional Breeding Population Estimates.*

2.3 Fulmar (Table 4) gives totals of 423 AOS for the North Colonsay & Western Cliffs SPA and 14 AOS for the remainder the Isle of Colonsay. In my count conducted in 2018 I found 550 AOS in the North Colonsay & Western Cliffs SPA and 13 AOS in the remainder of Colonsay.

2.5 Great Black-backed Gull (Table 6) over-estimates the figure for the remainder of Colonsay and under-estimates the total for the North Colonsay & Western Cliffs SPA as the counts for section PP7 are wrongly allocated to the Isle of Colonsay. This is a basic error as all sections PP1 – PP16 are in the North Colonsay & Western Cliffs SPA.

2.6 Guillemot (Table 7) over-estimates the figure for the remainder of Colonsay and under-estimates the total for the North Colonsay & Western Cliffs SPA as the counts for section PP7 are wrongly allocated to the Isle of Colonsay. This is a basic error as all sections PP1 – PP16 are in the North Colonsay & Western Cliffs SPA.

[No ref] Herring Gull (Table 8) over-estimates the figure for the remainder of Colonsay and under-estimates the total for the North Colonsay & Western Cliffs SPA as the counts for section PP7 are wrongly allocated to the Isle of Colonsay. This is a basic error as all sections PP1 – PP16 are in the North Colonsay & Western Cliffs SPA.

2.7 Kittiwake (Table 9) over-estimates the figure for the remainder of Colonsay and under-estimates the total for the North Colonsay & Western Cliffs SPA as the counts for section PP7 are wrongly allocated to the Isle of Colonsay. This is a basic error as all sections PP1 – PP16 are in the North Colonsay & Western Cliffs SPA.

2.9 Razorbill (Table 10) over-estimates the figure for the remainder of Colonsay and under-estimates the total for the North Colonsay & Western Cliffs SPA as the counts for section PP7 are wrongly allocated to the Isle of Colonsay. This is a basic error as all sections PP1 – PP16 are in the North Colonsay & Western Cliffs SPA.

Given these errors in the baseline figures for the North Colonsay & Western Cliffs SPA any conclusions regarding the impact (PVA) of the proposal on this Special Protected Area are therefore invalid and are grounds for rejecting this proposal.

3 There is an error in the *methodology used to assess the number of Great Northern Divers within the WDA*. While Appendix 11.2 explains that a correction for the number of Guillemot, Razorbill and Puffin includes a calculation for the number of birds under the water at the time of the surveys, no such correction has been made for Great Northern Divers (p36). Some of my recent work (Jardine, 2024) suggests that Great Northern Divers spend up to 50% of their time underwater, thus the figures used in the Environmental Impact Assessment Report may under-estimate the number of Great Northern Divers within the WDA by 100%. This failure to use peak counts which include the number of Great Northern Divers calculated to be under the water at the time of the survey invalidates the assessment for this species and is grounds for rejecting this proposal.

4 It is noted the details of the Razorbill population at the North Colonsay & Western Cliffs is not included in Table 7 of Appendix 11.7 but a Population Viability Assessment has been carried out for this species at this Protected Site.

Notwithstanding these errors, the Environmental Impact Assessment Report indicates that, through Collision Risk and Displacement, this proposal will have marked negative impacts on features of interest of the North Colonsay & Western Cliffs SPA (the breeding populations of Kittiwake, Guillemot and Razorbill). This site supports the largest population of the first two of these species in Argyll & Bute and it is not acceptable that this proposed development will impact negatively on these important designated populations during a period of Biodiversity crisis and seabirds in general are declining.

Therefore, in conclusion, I wish to object to the granting of a Section 36 Licence for the proposed Machair Wind Proposal (MD-00012385 / MD-00012386) on the following grounds:

- Errors in the Migratory Collision Risk Assessment, particularly for the endangered Corncrake
- Errors in the Regional Breeding Population Estimates, and consequently in the Impact Assessment, for the North Colonsay & Western Cliffs SPA
- Errors in the methodology used to calculate the peak count of Great Northern Divers in the WDA.
- The unacceptable negative impacts on the populations of Kittiwake, Guillemot and Razorbill at the North Colonsay & Western Cliffs Special Protection Area.

Yours sincerely,

[Redacted]

[Redacted]

References

Cleasby, I. R., Owen, E., Wilson, L., Wakefield, E. D., O'Connell, P. & Bolton, M. 2020. Identifying important at-sea areas for seabirds using species distribution models and hotspot mapping. *Biol. Conserv*. 241: 108375.

Jardine, David C, Peacock, Mike A, & Fisher, I.A. (2017) *The Birds of Colonsay and Oronsay*. Argyll Bird Club. 384pp

Jardine D C (2024) The feeding ecology of wintering Great Northern Divers *Gavia immer* in Argyll, Scotland. *Seabird* 36: 24-40.

Member of the Public 4988

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to Offshore wind farm - Hannah van Gool
Date: 19 September 2026 10:51:56

Objection to the Proposed MachairWind Offshore Wind Farm

As a regular and longstanding visitor to the Ross of Mull and the islands within sight of the proposed MachairWind development, I write to object to this application.

1. In support of the island communities already objecting

I open this objection by recording my admiration for the objections already lodged by the Iona Community, Colonsay Community Council and the community of Islay. The volume and quality of research behind their submissions is considerable, and I associate myself fully with the grounds they raise. I do not repeat their legal analysis in the same depth here. I adopt it, and I ask the Ministers to read this objection alongside theirs rather than as a stand alone submission.

2. Why I am writing: a visitor's perspective

I am not a resident of these islands, and I do not pretend to speak for them. I write as someone who has visited this coast every year for the past few years and I want the Ministers to understand what draws people like me back, again and again, because it is precisely what this application would take away.

I come here for what the wider landscape does to a person: an open Atlantic horizon uninterrupted by anything built by human hands, dark skies undimmed by artificial light, and a stillness that has become rare almost everywhere else. That is not a minor amenity. It is the whole reason to come, and it is exactly what the people who live here depend on for their livelihood, whether they run a guesthouse, a shop, a boat trip, or simply share their home with visitors like me for a season.

I know that if this development goes ahead, I would stop coming. Not as a protest, but because what I come for would no longer be there to find. A visitor looking out at 144 turbines, some as tall as 335 metres, standing permanently across that horizon is not looking at the island the communities objecting to this proposal are trying to protect. If people like me stop coming, in the numbers the applicant's own consultants concede cannot be ruled out, that loss falls first and hardest on the very island communities this application has never properly assessed.

3. What I am asking

I am asking the Scottish Ministers not to let that happen to people who have done nothing to deserve it, and who have already told the Ministers, in detail and at length, exactly what is at stake. I ask the Scottish Ministers to refuse consent under section 36 of the Electricity Act 1989, and I ask the Marine Directorate to refuse the associated marine licences under Part 4 of the Marine (Scotland) Act 2010.

Conclusion

For the reasons set out above, and for the fuller grounds set out in the objections of the Iona Community, Colonsay Community Council and the community of Islay, which I adopt in full, I object to the proposed MachairWind Offshore Wind Farm and ask that consent be refused.

[Redacted]

Visitor to the Ross of Mull and the surrounding islands, with Erraid as a special place in my heart!!

Member of the Public 4989

14th August 2026

[Redacted]

Objection to:

Marine Directorate references 00012385 and 00012386

Submitted by MachairWind Limited, ScottishPower Renewables

To whom it may concern,

I am writing this document sitting in Islay with the MachairWind Offshore Project in mind and how I know it will impact Islay. An island I have grown up being part of since the 1970s. The concerns would apply to the other Hebridean islands included in the Scottish Power Renewables – MachairWind Offshore Project documents - the islands closest to the proposed project.

Another project – the Mailin Offshore Wind project proposed off the South coast of the will have my exact same concerns. Ref: Welcome to Malin Sea Offshore Wind However, the words below are written for the MachairWind Offshore Project.

Some of my concerns, possible solutions and references provided as electronic links.

1. Rising sea Temperatures and changes to the Islay tides
2. Infrasound affecting Islay Sea animals and humans on the Coastal villages
3. Projects Metocean Survey and OSPAR Regions
4. Alloy waste leaking into the sea ecosystem from metal used to protect the turbines
5. Nuclear toxic waste in the Islay seas from Windscale/Sellafield
6. Earthquakes, unstable seabed, Islay storms and treacherous seas
7. History – Islay during WW1 and 11 and unexploded ordnance (UXO)
8. The Clearances again?
9. Renewables on Islay in the right place and examples of villages on the mainland
10. UNESCO – using the momentum/joining of forces from Tiree, Iona, Mull, Islay and Colonsay and apply for UNESCO /World Heritage Site.
11. Personal viewpoint
12. Conclusion
13. References

1. **Rising temperatures in the sea due to offshore wind farms and the knock-on effect to the North Atlantic Drift.**

Hydrodynamic impacts of offshore wind farms - rise in sea temperatures from the turbines that will affect not only the West of Scotland but beyond with the North Atlantic Drift.

Ref: Cumulative hydrodynamic impacts of offshore wind farms on North Sea currents and surface temperatures

Ref: North Atlantic Current | Map, Temperature, Definition, Location, & Direction | Britannica

Wind turbines on the seabed can interfere with the ocean surface winds which in turn cause the surface temperature on the sea to rise. The enormous blades will stop the natural flow of the cool sea breeze. This in turn will generate heat and ocean winds that usually flow naturally and keep the environment cool will be weakened. Impacting tides and currents far from Islay's shores.

2. **Infrasound caused by offshore wind turbine sound vibration**

Ref: Impairment of the Endothelium and Disorder of Microcirculation in Humans and Animals Exposed to Infrasound due to Irregular Mechano-

Ref: Infrasound from wind turbines could be 'a huge threat to the entire biodiversity': doctor | Wind Energy News

"When wind turbines rotate, however, they generate not only electricity but also infrasound. For Dr. Ursula Bellut-Staeck, this development represents "a huge problem for all forms of organisms," including humans. The medical doctor and scientific author has been studying the health effects of infrasound for several years. She has been looking into infrasound as a stressor on the cellular level since 2015 and published a paper in 2023 on how infrasound affects microcirculation and endothelial cells [link]."

The low-frequency sound waves will impact humans living on the Coastal areas of Islay and other islands. The sound vibrations from the offshore turbine will travel through the base through the seabed, the propellers whirring through the sea air and the body of the turbines itself in the sea and air to the coast and beyond. The sound vibrations are so low we cannot hear them, however, our bodies will sense them through the pressure on our ears, vibrations within our body. These sound waves, although we can't hear them are known to cause dizziness, fatigue and anxiety through changes to the pressure in

our ear, body vibrations and heart tissue stress. If left unresearched and undocumented, the effect this has upon our own bodies from a long-term perspective has yet to be heavily documented. The fruition of such research would provide useful insight and perhaps more consideration for projects such as the Machair Wind Project in the future.

For the marine animals, the sound will travel huge distances and affect communication and navigation within the sea. For example, whales use infrasonic calls that will move across entire oceans. For birds - infrasound wind passing over waves in the ocean helps them navigate.

3. **The "decline of hazardous substances"** and OSPAR Regions

Ref: MachairWind Windfarm Development Area Scoping Report
Pages 99 and 100 of the WDA Scoping Report.

The paragraph below make interesting reading. I was reading the University of Plymouth the Department of Marine Biology group – their findings are sea hazards are going up.

> – Celtic Sea having decreased by a third between 1990 and 2018. As a result, eutrophication within Region III – Celtic Sea is not increasing. With respect to hazardous substances, the trends for the assessed hazardous organic substances are downward, and most OSPAR Regions are also seeing a decline in heavy metal pollution. However, 10 of the 12 OSPAR sub-regions continue to have a poor status for hazardous substances in indicator species, largely caused by high levels of mercury and polychlorinated biphenyls. While there is no data within the QSR 2023 that is specific to Region III – Celtic Seas, tributyltin concentration levels in the Southern North Sea have decreased by approximately 10% per year. Despite this, the general levels of tributyltin within the OSPAR Maritime Area remains capable of causing effects on the marine environment.

The paragraph above claims a decline in pollution "OSPAR Regions are also seeing a decline in heavy metal pollution" and "the trends for the assessed hazardous organic substances are downward" Which hazardous organic substances were monitored for trends?

OSPAR Regions: fifteen Governments are Belgium, Denmark, Finland, France, Germany, Iceland, Ireland, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland and United Kingdom. However, in this paragraph below on the first website page of the OSPAR Commission BASED ON CURRENT UNDERSTANDING - they say there is an increase in impacts.

"*Knowledge of impacts from offshore windfarm developments in the marine environment … is rapidly increasing" and "Based on current understanding… offshore wind farms may have substantial impacts on biodiversity and the health of the marine environment."*

Ref: Offshore Renewables | OSPAR Commission

Environmental impacts of offshore renewables

Knowledge of impacts from offshore windfarm developments on the marine environment and its many natural features is rapidly increasing, but we are still lacking data, long term effect monitoring and sufficient evidence. Based on current understanding, unless developed sustainably, offshore wind farms may have substantial impacts on biodiversity and the health of the marine environment.

4. **The Alloy used to protect the turbines, corrodes and leaks into the ecosystem**

Ref: 4th February 2025 Offshore wind farms could cause significant ecosystem, economic and human health risks - Plymouth Marine Laboratory

Ref: Marine biology research group | University of Portsmouth

Ref: Offshore wind farms could cause significant ecosystem, economic and human health risks - Plymouth Marine Laboratory

Professor Gordon Watson, from the University's School of the Environment and Life Sciences, said:

"Offshore wind farms are a vital part of our clean energy future, but at the moment there is limited data on how these metals affect the environment near operational offshore wind farms, so it's hard to assess the full risks. We are definitely not saying stop building offshore wind farms, we just need to monitor them appropriately – especially as they continue to expand. The plans to scale up are ambitious and come with challenges that must be addressed".

In this study, scientists from Plymouth Marine Laboratory provided evidence using its recently developed ORIES database, as well as expertise relating to turbine numbers linked to metal release calculations.

Ref: Offshore wind energy: assessing trace element inputs and the risks for co-location of aquaculture | npj Ocean Sustainability

Published in Nature's npj Ocean Sustainability, estimated annual inputs of metals from current European wind farms to be:

- 3,219 tonnes of aluminium

- 1,148 of zinc
- 1.9 tonnes of indium

Offshore Wind Farms release thousands of tonnes of metal such as aluminium, zinc and indium all the time. This will grow, since offshore farms are having a major impact in reducing world's carbon emissions. These materials used to protect wind turbines from corrosion are seeping into the sea and posing a threat to ecosystems, seafood safety and human health.
For example, consuming oysters with high levels of zinc could surpass the recommended weekly intake for adults, posing risks to human health.

The alloys breakdown from moisture, salts and mechanical strain. The offshore turbines off the coast of Islay will not last long. I have found metal gates (painted yearly with Hammerite) and wheelbarrows start to deteriorate and crumble in Port Wemyss, Islay within a year with the salty corrosive air.

5. **Nuclear Powerplants in the UK/Scotland and toxic spills/hazards into the Islay Sea**

Ref: Windscale fire - Wikipedia
Ref: Dounreay: 'World's deepest nuclear clean-up' to begin - BBC News
Ref: Accumulation of Sellafield-derived radiocarbon (14C) in Irish Sea and West of Scotland intertidal shells and sediments - ScienceDirect
Ref: Health risk assessment and measurement of carbon-14 in environmental and biological samples: A comprehensive review - ScienceDirect

Islay fishermen. They know these seas better than anyone. In the late 1950s - 1990s, incidents at Windscale/Sellafield and Dounreay Nuclear Powerplants leaking toxic waste into the North and West Coast seas off Northern England and the West of Scotland. Fishermen on Islay noticed misshapen scallops and oysters' miles out to sea from the Rhinns coastline. They knew the areas to avoid. The MachairWind Offshore Windfarm is in an area that I have been told is still dangerous and to be avoided from toxic nuclear fallout / biohazards being dumped there. Local folk who have lived on Islay for years are very aware of the dangers posed.

In the Scoping document:
Ref: MachairWind Windfarm Development Area Scoping Report
Item M-24 – Parameter – Dropped Objects:

M-24	Dropped Objects	Dropped objects on the seabed during works associated with the WDA which may pose a hazard will be reported in line with the Marine Directorate - Licensing Operations Team (MD-LOT) procedures. Objects will be recovered where they pose a hazard to other marine users and where recovery is possible.

“Where recovery is possible” ?

Many campaigners have tried to stop the dumping of toxic radioactive waste In Scotland by the United Kingdom Atomic Energy Authority (UKAEA), a public body tied to the UK government.

I am sure many will be asking difficult questions to the Scottish Parliament and Westminster regarding this Offshore Wind Turbine Project, which objects are a hazard to other marine users and why would recovery not be possible? For example, alloy metals breaking down with corrosive salt air thereby seeping toxins into the Scottish sea?

Scottish Power Renewables is going to send workers out to those seas knowing there are biohazards. A “world leader” in clean energy. Certainly not clean seas where the MachairWind Offshore Windfarm is proposed to be and if it goes ahead certainly no further forward with clean seas, more likely contributing to the toxins in the sea.

The knowledge of toxic nuclear waste in the sea off the coast of Islay is spoken quietly by local folk this is backed up by science and historical events.

6. **Earthquakes, unstable seabed and treacherous seas**

Ref: Latest Earthquakes Near Isle of Islay in Scotland, United Kingdom (Recently Updated)

Landscape, history, storms and sea dangers hidden beneath the waves

Pretty pictures of calm seas and blue skies on the Scottish Renewables MachairWind Offshore marketing brochures. The Scottish Power Renewables brochure photo does not reflect the force of the Islay storms I have witnessed. The Atlantic gales. Unlike the Celtic Sea further South (Southern Ireland, Isle of Man, East coast of England, North West of France), Islay and Colonsay are blasted with the full force of the Atlantic sea. This part of the sea is no place for building and maintaining over 100 turbines standing 260-280 metres tall?

7. **History and UXO**

Ref: UXO Hotspots: Why Some Seas Are More Heavily Affected Than Others

Ref: Islay's Secret Wartime Visitors
Two world Wars, there are still the remnants of bunkers along the West Coast of Islay, look at Saligo beach. Native Ileachs know where the hidden dangers are on coastal areas. There will be unexploded devices (UXO) in this area of the Atlantic sea - U boats preying on Atlantic convoys during the Wars. Boats sailing from America towards to Glasgow and Liverpool. The Islay seas were a favoured hunting area for U boats. There is even an old U boat hiding place off the Coast of Islay in the Sound of Jura - if you know where to look.

Stormy seas, people heading off to the new world (graves at Sanaigmore beach) with the island clearances lives lost at sea. Folk lost to drownings in undercurrents, especially the dangerous West coast of Islay. The wild Islay Sea has claimed a lot of lives. Who wants to be responsible for lives lost due to the ill-conceived MachairWind Offshore Windfarm?

Lots of shipwrecks we know about too. Diving around these wrecks respectfully is one thing. Churning up the graves of sailors, soldiers and folk travelling to the new world into a construction site for profit is another.

8. **The Clearances again?**

Ref: Crofters and Cottars (Napier Commission) record guide | Scotland's People

My Ileach family and ancestors, stretching over hundreds of years, lived and worked on Islay and Jura. From the limited time I have had to read the project proposal.

I have concluded this enormous project - with toxins leaking from corroded alloy turbines destroying the marine life - to infrasound reaching the coastal villages and making villagers ill - this project would eventually make Islay uninhabitable. The Islanders would have to "clear out" for Iberdrola to make a profit. BiGGAR Economics warned this in their worst-case scenario for the islands.

Only a few island companies will see profits and benefit, e.g. civil and construction engineers and those in the supply chain linked to the MachairWind Offshore Windfarm. The tiny offerings to stakeholders on the islands are scraps from the table. Iberdrola will allegedly make millions if not billions from Scotland's natural resources whilst endangering the lives of animals and humans on Scotland's land and sea.

Community benefits I read in a community council minute 16th April 2026, raise concerns the cash benefits/shares are too small and or the quantity is not yet known. Yet Iberdrola allegedly will be making millions if not billions from Scotland's sea and wind. Selling it back to us for astronomical prices. Islay is freezing in the winter (unlike our Southern United Kingdom neighbours) and locals in Islay use a huge amount of electricity to keep warm all year round.

9. **Renewables in a small community like Islay and the other small islands**

I am all for renewables, however, they must be in the right place and with the local island communities benefitting from the projects. This would work for Islay folk and the other Hebridean islands. Providing renewable energy for the islanders, creating jobs and small enough for the island roads, schools, GP, little hospital, Dentist and housing to cope with the transient workers. The West side of Islay is too wild; the turbine would be blown into the sea or blades would snap. it would have to be located on the Eastern sheltered side. Two working examples below.

The Isle of Gigha

1. **Small wind farms for example like Faith, Hope and Charity on Gigha. Community owned.**

Fintry Development Trust - Sustainable future for Fintry

2. **Fintry, Stirlingshire. Community owned.**

There are small wind turbines on Islay producing electricity. Can there be more?

10. **UNESCO**

You have the attention of people from all over the world - apply for this special area to be a UNESCO site. There are lots of Professional folk who have written incredibly detailed and thought-provoking Objection documents, for example, Islay Community Council, The Iona Community and a Physicist and Oceanographer to name three, there are far more wonderful well written documents to read. I am sure help would come to you for something positive.

UNESCO World Heritage Centre - The Criteria for Selection

Why apply for UNESCO? Why not! The land, sea, sky, history. I am surprised it has not been done before now.
From the seafaring Lords, Norse-Gael warriors, Christian Monks, ancient Celtic Gods, World Wars to the Mariners who have sailed these wild Hebridean seas.
For example, Somerled and his descendants – guarantee there will be his descendants on Islay to this day. Godred Crovan, Columba* and his connection to green, grassy Islay, Finn MacCool, the Fianna, the Manannan man Lir, Tuatha De Dannan, Fingal's Cave, the Gallowglass, Dalriada, Spanish Armada, Atlantic convoys, The Gaels, The Highland Clearances, just some of what makes Islay and her surrounding seas famous.

*Ref: Saint Adomnan in his 720AD biography Vita Columba (Life of Columba)
Adomnan's Life of Columba : Saint Adamnan : Free Download, Borrow, and Streaming : Internet Archive

11. Personal Viewpoint

Since I was a little girl, I have been taught how to read the Islay sky. I have seen the Northern Lights. I have learned the constellations and watched for meteors. The film, Local Hero, I have experienced what the fictional character Felix Happer saw in the Hebridean night sky. If this offshore wind farm goes ahead, the Islay night sky will be lost for generations.

We are told the sea off the Coast of the Rhinns is dangerous and to respect her. We know how deep and unstable the seabed is off the West Coast of Islay. There have always been seabed tremors and the remains of UXO by U boats.

Old rayburns that use wood and coal keep you warm in a 200-year-old Croft house in a Conservation village on The Rhinns when the electricity has gone off with storm power cuts. To reiterate as in item 6., does Scottish Power Renewables realise the force of the Atlantic gales and this part of the sea is no place for building and maintaining over 100 turbines standing 260-280 metres tall?

12. Conclusion

Islay, Mull, Iona, Colonsay, Coll and Tiree, and the International Community are watching - we all have one thing in common, trying to convince you to look after this part of the ocean and our Hebridean history. Governments get voted out. The choices you make now will impact our islands forever.

MachairWind Offshore Windfarm - Machair in Gaelic means a low lying grassy plain or a wild coastal grassland, nothing to do with the open sea. They have misused the word Machair.

The paid consultants BiGGAR Economics have told their client to examine the impact for local folk further. Have you read their worst-case scenarios tables? Islay becoming uninhabitable. To me, it is like the Highland and Island Clearances in the late 18th century. Only this time instead of sheep it is a huge offshore wind farm, all for profit.

Iberdrola, a Spanish firm. The Spanish Armada tried to escape during a war in the late 16th century. Islay seas claimed hundreds of Spanish sailors' lives. If this Project gets the go ahead, I hope Spanish workers and mariners don't suffer the same tragic fate of 400 years ago.

[Redacted]

13. References

Welcome to Malin Sea Offshore Wind

Cumulative hydrodynamic impacts of offshore wind farms on North Sea currents and surface temperatures

North Atlantic Current | Map, Temperature, Definition, Location, & Direction | Britannica

Impairment of the Endothelium and Disorder of Microcirculation in Humans and Animals Exposed to Infrasound due to Irregular Mechano-

Infrasound from wind turbines could be ‘a huge threat to the entire biodiversity’: doctor | Wind Energy News

MachairWind Windfarm Development Area Scoping Report

Celtic Sea - Wikipedia

Offshore Renewables | OSPAR Commission

Offshore wind farms could cause significant ecosystem, economic and human health risks - Plymouth Marine Laboratory

Marine biology research group | University of Portsmouth

Offshore wind farms could cause significant ecosystem, economic and human health risks - Plymouth Marine Laboratory

Offshore wind energy: assessing trace element inputs and the risks for co-location of aquaculture | npj Ocean Sustainability

Windscale fire - Wikipedia

Dounreay: 'World's deepest nuclear clean-up' to begin - BBC News

Accumulation of Sellafield-derived radiocarbon (14C) in Irish Sea and West of Scotland intertidal shells and sediments - ScienceDirect

Health risk assessment and measurement of carbon-14 in environmental and biological samples: A comprehensive review - ScienceDirect

MachairWind Windfarm Development Area Scoping Report

Latest Earthquakes Near Isle of Islay in Scotland, United Kingdom (Recently Updated)

UXO Hotspots: Why Some Seas Are More Heavily Affected Than Others

Islay’s Secret Wartime Visitors

Crofters and Cottars (Napier Commission) record guide | Scotland's People

The Isle of Gigha

Fintry Development Trust - Sustainable future for Fintry

UNESCO World Heritage Centre - The Criteria for Selection

Adomnan's Life of Columba : Saint Adamnan : Free Download, Borrow, and Streaming : Internet Archive



The Rhinns Mermaid last seen in 1857
[Redacted]
2025

Ref: Real Mermaid Sightings: Port Charlotte, Islay (1857)

Member of the Public 4990

From: [Redacted]
To: MD Marine Renewables
Cc: Liz Arnesen
Subject: FORMAL OBJECTION: MachairWind Offshore Wind Farm Proposal (Section 36 Consultation)
Date: 15 August 2026 18:18:40

Dear Marine Directorate Planning Team,

I am writing to formally register my objection to the proposed MachairWind Offshore Wind Farm in the Inner Hebrides. While I fully support the long-term decarbonisation of our energy network, this massive project represents an unacceptable compromise of local ecology, a threat to island economies, and a profound misallocation of national infrastructure capital.

I urge the Marine Directorate to refuse consent based on the following key points:

1. Destruction of Pristine Seascapes and Local Economies
   The sheer scale of this project—covering 448 km² with turbines reaching up to 335 metres in height—will permanently industrialise some of Scotland's most iconic and culturally significant seascapes, including those surrounding Iona, Mull, and Tiree. These fragile island communities rely heavily on a thriving tourism and visitor economy that will be directly threatened by this immense visual degradation.

2. Ecological Data Gaps and Marine Threats
   The project's Environmental Impact Assessment leaves unacceptable gaps regarding underwater noise pollution and threats to migratory bird paths. The Hebridean waters are a critical habitat for diverse marine mammals, and the long-term disruption caused by construction and operation poses a severe risk to our local biodiversity.

3. Strategic Infrastructure Misallocation and Grid Inefficiency
   The Scottish grid is already suffering from severe transmission bottlenecks. Committing vast regulatory resources and multi-year planning timelines to a low-density, weather-dependent energy array like MachairWind is highly inefficient. Scotland frequently pays millions in "constraint payments" to wind developers to turn turbines off because the grid cannot handle production surges. Our planning capital and energy investments should be redirected toward modern, high-density, and reliable baseline energy solutions—such as advanced nuclear assets or Small Modular Reactors (SMRs)—which provide continuous power without requiring the mass industrialisation of our coastlines.

For these reasons, I believe the MachairWind proposal is the wrong project for the Hebrides and a flawed approach to Scotland's long-term energy needs. I urge you to reject this application.

Yours faithfully,

[Redacted]

[Redacted]

[Redacted]

Sent from my iPhone

Member of the Public 4991

From: [Redacted]
To: [Redacte
Subject: FW: MachairWind application
Date: 26 August 2026 10:45:44

Hi Abby,

Please include this as an objection for Machair.

Thanks,
Ben

From: [Redacted]
Sent: 07 July 2026 11:48
To: Central Correspondence Unit <contactus@gov.scot>
Subject: MachairWind application

Good morning,

I understand that a consultation is underway in regard to the proposed MachairWind application for a large wind farm between Islay, Jura, Colonsay, Iona, Mull, Tiree, Staffa and the Treshnish Islands.

This would be a monstrous intrusion in a world famous area of outstanding natural beauty with adverse effects on marine life, bird life, tourism, local communities, commercial fishing and recreational boating.

It is astonishing that such an application should even be considered and I urge you to dismiss it.

Thanks

[Redacted]

Member of the Public 4992

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Formal Objection to the MachairWind Offshore Wind Farm Development Reference: 00012385 / 00012386
Date:	01 August 2026 17:57:56

[Redacted]

RE: Formal Objection to the MachairWind Offshore Wind Farm Development Reference: 00012385 / 00012386

Dear Sir / Madam,

I am writing to formally lodge my objection to the proposed MachairWind offshore wind development.I am a resident of Northern Ireland, now in my 80s. I have traveled to the Isle of Iona regularly throughout my entire life.

My objection is not born of a general opposition to renewable energy, but of a clear-eyed understanding of what this specific development will irreversibly destroy.

I request that the Marine Directorate reject this application based on the following critical grounds:

Incompatible Industrial Scale: The proposed turbines are vast, industrial structures. Because of their sheer height, physical size, and high numbers, they will completely dominate the open seascape. They introduce an ominous, unavoidable mechanical presence into a maritime landscape that has remained open and unaltered for centuries.

Destruction of a Nationally and Globally Significant Sanctuary: For Christians worldwide, Iona holds immense cultural, historical, and spiritual significance. It is not a generic scenic viewpoint; it operates actively as a unique place of healing, sanctuary, and profound spiritual retreat.

The Irreplaceable Value of an Unbroken Horizon: The core value of Iona relies heavily on its isolation and quietude. Introducing a massive industrial footprint directly onto this specific horizon permanently alters the character of the island, making the sanctuary and peace it offers impossible to fully experience.

An offshore wind farm of this magnitude belongs in an area devoid of such profound cultural and historical weight. You cannot place a vast industrial complex on the doorstep of a global sanctuary without fundamentally compromising its purpose.

I urge the Directorate to recognize that some places are simply too significant to be industrialized, and to reject this proposal in its current location.

Yours faithfully,

[Redacted]

Sent from AOL on Android
Sent from my iPad

Member of the Public 4993

From:	**[Redacted]**
To:	MD Marine Licensing
Subject:	Objection to Marine License Application - 00012385 and 00012386 - MachairWind Offshore Wind Farm.
Date:	15 August 2026 19:44:38

Dear Sir,
I am a Christian. I venerate St. Columba, who founded Iona in A.D. 563. Since that time Iona has been a seminal focus of pilgrimage for our faith.
In setting up what is effectively a desecration of this place of pilgrimage, Scottish Power Renewables are launching a blatant attack on my faith. Wind turbines with a maximum height of up to 1,099 feet are being proposed, some 13 miles from the island.
I strongly suspect the motives of Scottish Power - there is a movement afoot that wants nothing better that to devastate Christian heritage sites the world over.
Very many objections to this development have been brought to your attention on the grounds of health, aesthetics and environment . . . .
I would, however, insist that the increasingly damaging winds along the Atlantic coast would undoubtedly indicate a danger to life from detachment of turbine blades.
Yours sincerely,
[Redacted]

Member of the Public 4994

Public Consultation Response

Dated 15 August 2026

Via email to: md.marinerenewables@gov.scot

PROJECT NAME : MachairWind Offshore Wind Farm

Marine Licence Reference Numbers:

MD-00012385 – Offshore Generation Station

MD-00012386 – Transmissions Infrastructure

Response made by:

[Redacted]

_____

RESPONSE

I wish to OPPOSE the application filed under no's MD-00012385/6 for the following reasons:

1. The application evidences NO NEED, NO URGENT REQUIREMENT, in its choice of the proposed project footprint, to disturb the ecology of the East Atlantic Flyway by exposing thousands, millions over time, of migrant birds to risks to life, limb, family breakdowns and psychological dramas while they migrate on historic routes used since before civilisation as we know it in the West today – **See SECTION A of this response**
2. The application evidences NO NEED, NO URGENT REQUIREMENT, in its choice of the proposed project footprint, to disturb, to put at risk the very thing that makes the Scottish Isles unique across the whole globe, a vista over a natural, evocative ocean and way of peaceful, spiritual existence that has meant, and still means, so much to so many, that sits at the very heart of todays main industry, tourism, and at the heart of the ancient and current Christian Orthodoxy, of IONA - and through IONA the Western Isles. Because of its magnitude, the industrialisation of this vista without obtaining the approval of the population of IONA, MULL and the Western Isles to the location of the footprint of the project would be an act of imposed, gradual, self-destruction – **See SECTION B of this response**

SECTION A

The application evidences NO NEED, NO URGENT REQUIREMENT, in its choice of the proposed project footprint, to disturb the ecology of the East Atlantic Flyway by exposing thousands, millions over time, of migrant birds to risks to life, limb, family breakdowns and psychological dramas while they migrate on historic flyway routes used since before civilisation as we know it in the West today.

Question 1: Has the precise location of the footprint of the project on the recorded flight of migratory birds shown that some bird species overfly the island of Iona on their seasonal journeys

_____

Answer 1: Yes, high-resolution satellite tracking and GPS data have officially confirmed that several migratory bird species overfly, stop, and refuel on the Isle of Iona on their seasonal journeys. Located off the western tip of the Isle of Mull along the East Atlantic Flyway, Iona serves as a vital aerial corridor and a critical geographic stepping stone for birds travelling between their Arctic breeding grounds and wintering habitats in Africa and Southern Europe.

Key Tracking Insights and Overflying Species

- **Arctic Shorebirds:** Tracking studies from organisations like the British Trust for Ornithology (BTO) show that species like **Dunlins, Ringed Plovers, and Sanderlings** use Iona's specialized sand ecosystems (the machair) to refuel mid-journey.
- **The Corncrake (Crex crex):** This highly endangered, elusive migrant travels north from Sub-Saharan Africa. Modern GPS and satellite tracking initiatives show that these birds specifically target Iona as one of their primary breeding strongholds in the UK.
- **Raptors and Marine Hunters:** Tracking data from regional programs, such as the Mull Eagle Watch, map the flight corridors of apex predators like the **White-tailed Eagle** and visiting **Ospreys**, confirming they regularly traverse the Sound of Iona during their seasonal movements.
- **Ocean Seabirds:** Global datasets compiled in the BirdLife International Seabird Tracking Database prove that long-distance wanderers—including Skuas and Terns—frequently cross over this specific maritime highway.

Question 2: Do the Ocean Flyways publicised on World Migratory Bird Day and Global Bird Weekend give any sense of the width of the flyways over Iona and Mull and whether there is seasonal drift on those highways when deflected by changing air currents and wind strengths

_____

Answer 2: The global conservation campaigns highlighted during World Migratory Bird Day and Global Bird Weekend—particularly the launch of BirdLife International's Ocean Flyways framework—provide an ocean-basin scale perspective rather than local pinpointing. They do not explicitly define the precise width of flyways directly over the Isle of Iona or the Isle of Mull. Instead, these high-profile initiatives conceptualise migration as broad, macro-level "superhighways".

However, when combining their raw dataset foundations (pulled from the Seabird Tracking Database) with radar ornithology, we can extract clear answers regarding both flyway width and seasonal wind drift over the Inner Hebrides.

---

1. The Width of the Flyway Over Iona and Mull

Rather than being narrow, geometric flight paths, the flyways publicized by these global events represent fluid, dynamic corridors.

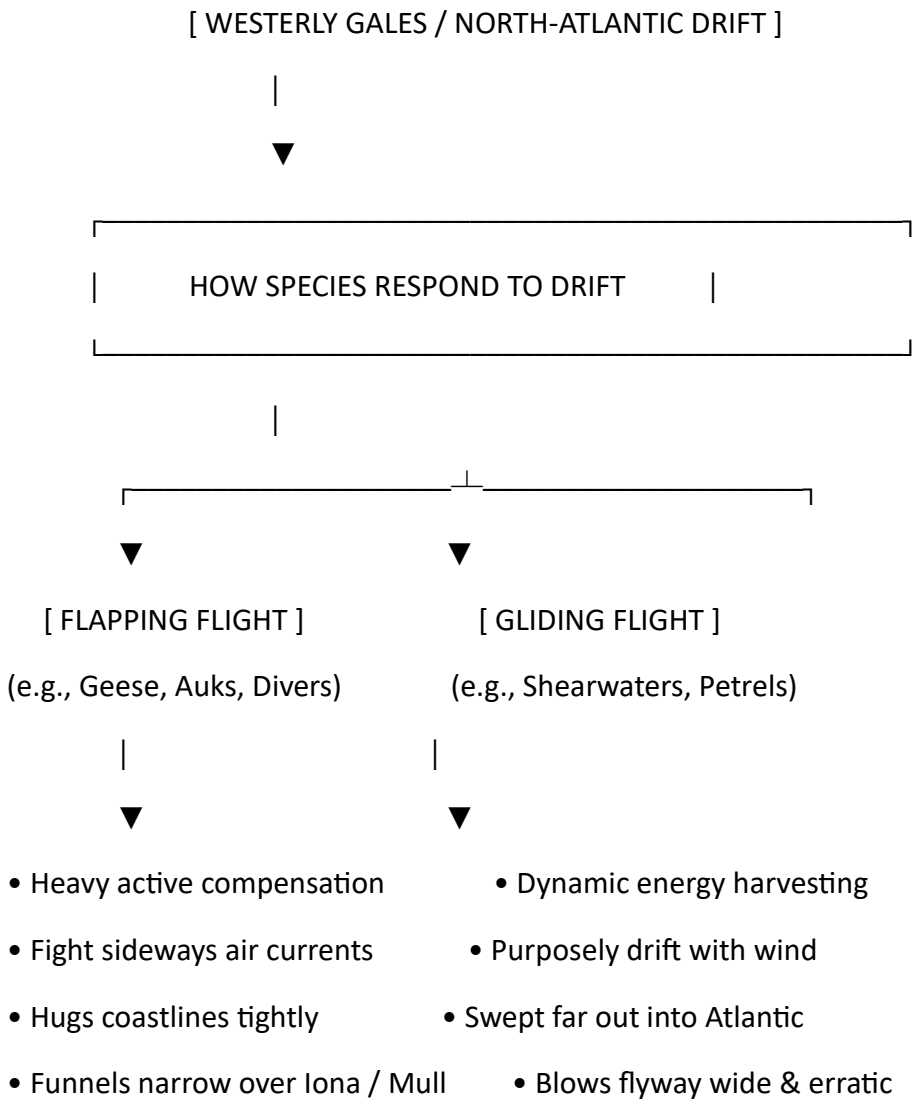
- **The Macro Scale:** Iona and Mull sit directly beneath the **Atlantic Ocean Flyway** (specifically the terrestrial and coastal intersection known as the **East Atlantic Flyway**). At this scale, the flyway spans **hundreds of kilometres wide**, enveloping the entire western coast of Scotland and the north-western fringes of Europe.
- **The Micro "Funnel" Effect:** While the macro highway is vast, geographical features squeeze it locally. As birds travel south from Iceland or Greenland, the Outer and Inner Hebrides act as a physical funnel. For shorebirds, the width shrinks to just a few kilometres, corresponding strictly to specific habitat zones—such as the unique **machair grasses and sandy beaches of Iona** and the rocky coasts of Mull.

---

2. Seasonal Drift and Wind Deflection

Scientific tracking data supporting these global campaigns proves that these sky highways are subject to significant **seasonal drift** caused by atmospheric changes. The paths are not static; they bend, compress, and drift based on changing air currents and wind strengths.

How birds navigate this wind deflection over the Hebrides depends entirely on their biological flight mechanics:



- **Flapping Birds (Active Overcoming):** Species like geese, swans, and wading shorebirds rely on flapping flight. When powerful autumn westerlies blow off the Atlantic, these birds actively crab (turn into the wind) to compensate for drift. If wind strengths become overpowering, they are deflected eastward, forcing them to hug the coastlines of Mull and Iona tightly for mechanical shelter, temporarily narrowing the visible flyway corridor.
- **Gliding/Pelagic Seabirds (Passive Harvesting):** Dynamic soaring birds like Shearwaters, Petrels, and Albatrosses use prevailing winds to conserve energy. Instead of fighting wind deflection, they ride it. Strong seasonal shifts in wind currents cause their flyway to "drift" massively across the ocean. In a gentle tailwind, they may pass directly through the Sound of Iona; during an intense Atlantic depression, their highway drifts dozens of miles westward into the open ocean.

Summary

The maps seen on World Migratory Bird Day show the grand interconnected "pipes" of global migration. However, look closer at the underlying tracking data, and you see that **Iona and Mull are a flexible bottleneck**—where the highway's width and path expand, contract, and drift with every seasonal change in the Atlantic weather systems.

Question 3 Is there any evidence to show that the height of the tip of the proposed MachairWind wind vanes (in project MD- 00012385/6) plus 50% ie 500 metres, would place the turbulence or direct interference of the project MachairWind windvanes into direct connection with the East Atlantic Flyway

_____

Answer 3: Yes, extensive ornithological evidence and Marine Directorate application data demonstrate that at a maximum vertical boundary of 500 metres (the 335–340m blade tips plus a 50% buffer), the proposed MachairWind offshore wind farm intersects directly with the low-to-mid altitude flight corridors of the East Atlantic Flyway.

ScottishPower Renewables' recent Section 36 consent application (submitted to the Scottish Government's Marine Directorate under the code series mirroring your reference) outlines an array of up to 144 massive turbines positioned northwest of Islay and west of Colonsay/Iona.

The scientific overlap regarding physical height, wake turbulence, and migratory flight paths is structured below.

1. Physical Interception of Flight Altitudes

The proposed MachairWind turbines are among the tallest ever planned globally, featuring an unprecedented blade-tip height of up to 335 to 340 metres above sea level. Adding a 50% buffer (500m) encompasses the zone of immediate wake disruption.

Radar ornithology studies tracking the **East Atlantic Flyway** reveal that migratory altitudes are highly species-dependent, placing multiple groups in direct conflict with this 0–500m zone:

- **Macro-Migrants in Adverse Weather (0–300m):** While species like Geese, Whooper Swans, and heavy wading birds prefer to migrate at heights above 500m in clear conditions to find efficient air layers, they **drop drastically to altitudes under 150–300 metres during poor visibility, heavy head winds, or low cloud cover**. This forces them directly into the sweeping path of the rotor blades.

- **Pelagic Seabirds (0–100m):** Native and passage seabirds using the Inner Hebrides corridor (such as Gannets, Manx Shearwaters, and Kittiwakes) operate almost entirely within the lower 100 metres of the marine boundary layer. They face direct macro-collision risks rather than just wake turbulence.
- **Nocturnal Passerine Migrants (150–600m):** Vast numbers of small songbirds cross the Hebrides at night. Heavy westerlies frequently compress their flight altitude down into the 200–500m window, meaning a 500m impact ceiling directly splits their transit layer.

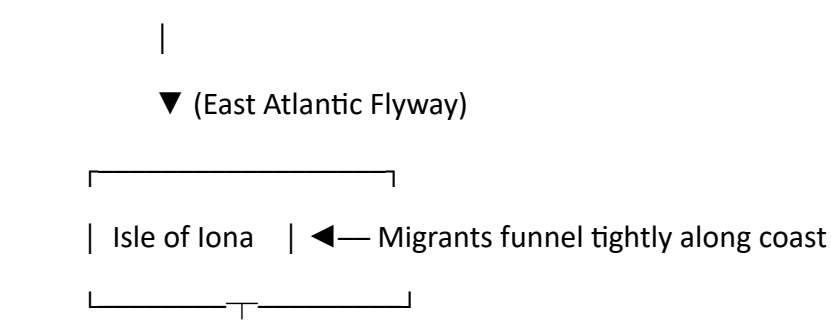
2. The "Wake Effect" and Aerodynamic Turbulence

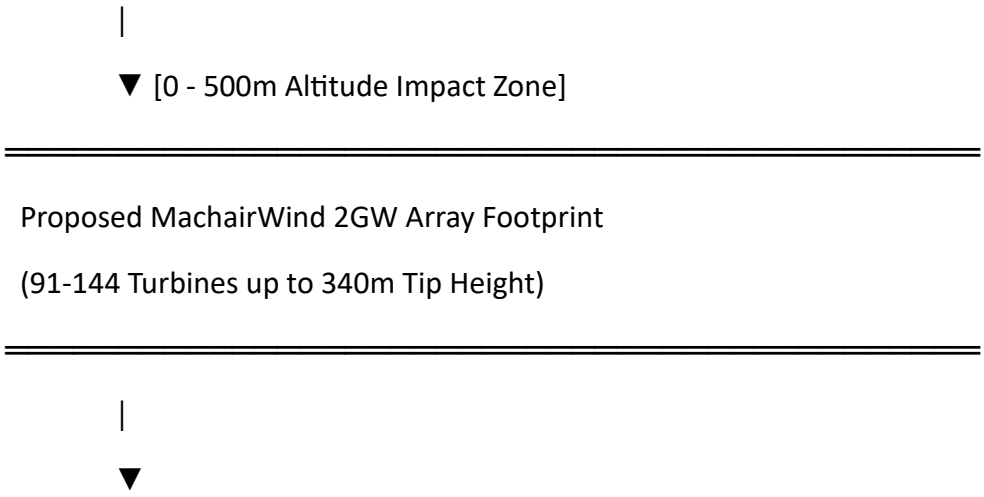
The concern regarding an extra 50% boundary (reaching up to 500 metres) aligns with aerodynamic data on **Wind Turbine Wake Interferences (WTWI)**.

- Giant 2GW-scale turbines do not just block air; they create a massive downwind "tunnel" of highly turbulent, desynchronised air and micro-vortices.
- This turbulence can extend vertically well above the physical blade tip due to upward displacement of the marine boundary layer as wind fields hit the array.
- For migrating birds, entering a 500m-high thermal or mechanical turbulence zone forces them to expend significantly more energy, causing disorientation—especially during night flights or heavy Atlantic weather fronts.

3. Spatial Funneling and the Iona-Colonsay Bottleneck

The geographic footprint of project MachairWind covers roughly 448 square kilometres. It sits right across the coastal visual lines of Iona, Mull, and Colonsay.





As detailed by local objections from the Visit Mull and Iona groups and environmental bodies, the extreme height and "nearshore" location (~13 miles from Iona) create a massive barrier. Birds migrating along the inner Hebridean marine corridor cannot easily bypass a footprint of this scale without altering their flight path.

Current Status

Because the public consultation window with the Scottish Ministers closes tightly around **August 2026**, statutory environmental responses from organisations like RSPB Scotland and the Hebridean Whale and Dolphin Trust have heavily scrutinised these exact numbers. They argue that the combined collision risk and micro-climate turbulence up to 500m present unmitigated hazards to the flyway's integrity.

Question 4: Is there any evidence in the MachairWind project applications covered by project numbers MD-0001235/6 that the proposed footprint of the MachairWind wind farm is planned to avoid any risk to migratory birds using the East Atlantic Flyway

---

Answer 4: No, there is no evidence within the official application text indicating that the project footprint was intentionally drawn or relocated to avoid the East Atlantic Flyway.

In the Section 36 consent applications submitted by MachairWind Limited (a subsidiary of ScottishPower Renewables) to the Scottish Government’s Marine Directorate under

reference numbers **MD-00012385 and MD-00012386**, the physical footprint remains firmly situated across 448 square kilometres of the Inner Hebrides marine corridor.

Rather than attempting to *avoid* the flyway through site relocation, the developer's Environmental Impact Assessment (EIA) relies on **statistical modelling to argue that the risk is "acceptable," combined with operational mitigation frameworks**.

How the Application Handles Flyway Risks

Instead of geographic avoidance, the EIA documentation manages the overlap with the East Atlantic Flyway through the following arguments and mechanisms:

1. Reliance on Collision Risk Modeling (CRM)

The application includes extensive technical appendices detailing strategic **Collision Risk Modeling** for migratory and marine birds.

- The developer's experts use these mathematical models to argue that the vast majority of macro-migrants fly either higher or lower than the rotor swept area during clear conditions.
- The application concludes that the statistically predicted mortality rate does not present a "significant adverse effect" on the overarching populations of the flyway, a point heavily contested by conservation groups.

2. The Mitigation Register over Avoidance

In Appendix A (Mitigation Register) of the application, the strategies listed focus on reducing the severity of an impact rather than avoiding the area entirely:

- **Increased Blade Clearance:** Setting the lower tip of the turbine blades at a higher minimum clearance above the sea surface to allow low-flying seabirds to pass underneath safely.
- **Smart Lighting:** Using specialized lighting arrays on the structures to minimize the attraction and disorientation of nocturnally migrating passerines (songbirds) during low-visibility weather events.

3. Strategic Macro-Siting Constraints

The developer maintains that the footprint location itself was dictated by the Scottish Government's **Sectoral Marine Plan for Offshore Wind** (which designated this specific zone, known as site N4). Because they are bound to the N4 boundaries, shifting the project entirely out of the East Atlantic Flyway funnel was treated as unfeasible during the design phase.

Why Conservation Objections Contradict the Application

Because the public consultation window concludes on 15 August 2026, formal objections submitted to the Marine Directorate by bodies such as RSPB Scotland, the National Trust for Scotland, and the Hebridean Whale and Dolphin Trust (HWDT) directly attack the developer's risk assumptions.

These environmental groups argue that the application's models drastically underestimate **macro-migrant behavior in foul weather**, when head winds force millions of birds to drop down directly into the 335-metre rotor zone, turning the un-avoided footprint into an ecological barrier.

Question 5: In your opinion, does the MachairWind project MD-00012385/6 seek to avoid all risks to migratory birds using the East Atlantic Flyway, a Flyway which might have been in use since the beginning of modern times, a route to the possible survival of the species. Is there any evidence in the same project application that MachAir has made a serious attempt to find other locations for this project which have far less impact on the ecology of bird migration - without creating other ecological risks of equivalent risk impact.

_____

Answer 5: When analyzing the official application documents for the MachairWind Offshore Wind Farm (Project IDs: MD-00012385 and MD-00012386) submitted by ScottishPower Renewables to the Marine Directorate, two clear conclusions emerge regarding risk avoidance and alternative location searches.

1. Does the Project Seek to Avoid All Risks to the Flyway?

No. The application does not seek to avoid all risks to the East Atlantic Flyway.

From an ornithological standpoint, complete risk avoidance requires *spatial separation*—meaning the project footprint would be shifted entirely out of the geographical bottleneck used by these birds. Instead of avoiding the flyway, MachairWind's application accepts the overlap and uses a framework of **risk management and mitigation tolerance**:

- **Statistical Thresholds over Elimination:** The developer uses Collision Risk Modeling (CRM) to argue that the percentage of the flyway population killed by the 335-metre-tall turbines falls within a "statistically acceptable" ecological threshold. It does not aim for zero impact.
- **Conditional Vulnerability:** The application relies on normal bird behavior under clear skies to prove safety. However, as noted in objections by Tiree Community Council regarding vulnerable, nocturnally migrating species like the **Corncrake**, the application cannot eliminate the acute threat posed when poor weather forces flyway traffic down into the rotor zone.

2. Did the Developer Seek Alternative Locations with Lower Impact?

No. There is no evidence in the application that the developer conducted an independent search to find alternative geographic regions with lower ecological impact.

As detailed in *Volume 1, Chapter 4: Site Selection and Alternatives* of the Environmental Impact Assessment Report (EIAR), the developer's site selection process was structurally restricted from the start:

Project Stage	Developer Approach & Constraints
Macro-Siting Constraint	The project footprint is strictly bound to **Site N4**, an area designated by the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy. The developer did not have the legal remit to test other areas of the Scottish coast to see if they were safer for birds.
"Within-Site" Alternatives Only	The "Alternative Sites" section of the application only covers micro-siting *within* the pre-defined 448-square-kilometre N4 boundary. It focuses on where to place cable landfalls, substation connections, or how to arrange turbine arrays to avoid local underwater hazards, rather than evaluating entirely alternative geographic regions.
Commercial Bias	Moving the project further out into the open Atlantic to bypass the Hebridean coastal bird corridor would require deep-water floating wind technology. The developer ruled out deep-water variants based on economic feasibility and technical constraints, choosing to stay in the shallower nearshore waters directly intersecting the flyway.

Conclusion

MachairWind did not hunt for an alternative, lower-impact home for this project. They accepted a pre-allocated government plot that sits directly across an ancient ecological superhighway. The application focuses on justifying the project's presence in that flyway rather than proving it searched for a way to leave it untouched. This is an unacceptable risk to a flyway of historic ecological importance

SECTION B

The application evidences **NO NEED, NO URGENT REQUIREMENT**, to disturb, to put at risk the very thing that makes the Scottish Isles unique across the whole globe, an unbroken vista over a natural, evocative ocean and way of peaceful, spiritual existence that has meant so much to so many, that sits at the very heart of todays main industry, the very heart, tourism, and the centuries old Christian Orthodoxy of IONA - and through IONA the Western Isles. The industrialisation of this vista by outsiders without obtaining the approval of the population of IONA, MULL and the Western Isles to the footprint of the project would be an act of cultural and economic imperialism by a remote body.

Question 1: Given good visibility, how far in miles or kilometres will the tip of any of the masts of the project, 335 metres above sea level, be visible above the horizon from the highest points of Iona (in other words will any of the masts be visible anywhere on Iona, 11 miles from the proposed masts

Answer 1: Yes, the masts and blade tips will be overwhelmingly visible from anywhere on Iona. Given good visibility, the 335-metre tips are mathematically capable of being seen from up to 68 miles (109 km) away from the highest point of Iona, meaning that at a close distance they will dominate the western marine horizon.

Because the project footprint reaches well within the maximum geographic line of sight, the curvature of the Earth will provide almost no screening effect.

1. Visibility from Iona's Highest Point (Dùn I)

- Elevation: Dùn I stands at 101 metres (331 feet) above sea level.
- The Horizon Line: From this height, a person's natural horizon line looking out over the Atlantic sits roughly 24 miles (38.7 km) away.

- The Result: Because the proposed MachairWind array is located just 13 miles away—well *in front* of the horizon line—100% of the 335-metre turbine structure will be entirely visible. The sea will not block any portion of the masts, nacelles, or blades from this viewpoint.

2. Visibility from Iona's Beaches (Sea Level)

Even if you are standing directly on the western coastline or beaches of Iona (assuming an eye level of 2 metres above sea level):

- The curvature of the Earth only hides the bottom 10 metres (33 feet) of the structures below the water line.
- 325 metres (1,066 feet) of the turbine masts and sweeping blades will still project directly into the sky above the open ocean horizon.

Visual Impact Summary

At a distance of 13 miles, these turbines will not appear as tiny dots on the horizon. For scale, a 335-metre structure viewed from 13 miles away will take up a vertical angle in the human field of view that is roughly equivalent to holding an object 3.5 centimetres tall at arm's length. **If the project proceeds with its maximum proposed dimensions, the array will form a highly prominent, unbroken industrial wall spanning across the island's famous, uninterrupted western sea views.**

Member of the Public 4995

From: [Redacted]
To: MD Marine Renewables; MD Marine Licensing
Subject: Formal Objection to Marine Licence Application 00012385 – MachairWind Offshore Wind Farm
Date: 14 August 2026 22:59:53

Dear Sir / Madam

Please find below a passionate and heartfelt objection to MachairWind's proposal for an Offshore Wind Farm (Marine Licence Application 00012385).

My wife and I have been residents on the Isle of Mull since 2013 and have fallen deeply in love with its landscape, people, wildlife and history – and that of the surrounding islands.

We are horrified that this proposal has been put forward and ask that it is dismissed immediately, to avoid irreparable damage to the beauty, ecology, heritage and natural history of this world-class site.

I would appreciate confirmation of safe receipt from yourselves.

Yours faithfully

[Redacted]

[Redacted]

Tel: [Redacted]
E:mail [Redacted]

FORMAL REPRESENTATION OF OBJECTION

Marine Licence Application 00012385 – MachairWind Offshore Wind Farm

Submitted to: Marine Directorate – Licensing Operations Team

Submitted by: Professor Paul J Matts, Resident of the Isle of Mull (Victoria Cottage, Breadalbane Street, Tobermory, Isle of Mull PA75 6PE)

INTRODUCTION

I respectfully object to Marine Licence Application 00012385 for the proposed MachairWind Offshore Wind Farm.

To be clear, I support Scotland's transition towards renewable energy and

acknowledge the importance of offshore wind in achieving national climate objectives. However, it seems that renewable energy policy presumes that offshore wind proposals be approved, irrespective of environmental consequences.

The Marine Directorate has a statutory duty to ensure that marine licensing decisions comply with environmental legislation, marine planning policy and the precautionary principle.

In my strong and considered opinion, the applicant has not demonstrated that the proposal satisfies these requirements.

The information currently available leaves significant uncertainty regarding impacts upon internationally-important marine habitats, protected bird populations, landscape and seascape character, cultural heritage, tourism and local communities.

Where such uncertainty exists, the 'Precautionary Principle' requires Refusal unless adverse effects can be excluded with confidence.

Please see below the main tenets of my formal objection:

1. **LEGAL FRAMEWORK**

The Marine Directorate is required to determine this application in the context of Regulation that includes (but that is not limited to):

- Marine (Scotland) Act 2010
- UK Marine and Coastal Access Act 2009
- Conservation (Natural Habitats etc.) Regulations
- Nature Conservation (Scotland) Act 2004
- Climate Change (Scotland) Act
- National Marine Plan
- National Planning Framework 4
- Scottish Biodiversity Strategy
- International obligations arising under the Convention on Biological Diversity and relevant bird conservation agreements.

The existence of national climate objectives does not override these statutory duties.

Rather, environmental protection and climate mitigation must be balanced in accordance with the law.

2. **THE PRECAUTIONARY PRINCIPLE**

One of the fundamental principles underpinning environmental decision-making is the so-called 'Precautionary Principle'.

Where significant uncertainty remains regarding adverse environmental effects, consent should not be granted merely because impacts have not yet been conclusively demonstrated.

The burden rests with the applicant to demonstrate that unacceptable impacts are unlikely to occur. I believe it is obvious even to the non-expert layman that, in the context of Marine Licence Application 00012385, this burden has not been discharged.

3. IMPACT UPON PROTECTED BIRD SPECIES

The West coast of Scotland supports internationally-recognised populations of seabirds and birds of prey.

These include species protected under domestic legislation and international conservation agreements.

Potential impacts include:

- collision mortality;
- displacement from feeding grounds;
- barrier effects;
- cumulative mortality;
- disturbance during construction;
- indirect food-web effects

Of particular concern are cumulative effects across multiple offshore wind developments.

Even where individual projects predict relatively small increases in mortality, cumulative effects may become ecologically significant.

The Environmental Impact Assessment appears to rely heavily upon predictive modelling.

While modelling is essential, it cannot substitute for certainty where internationally-important populations may be affected.

4. CUMULATIVE EFFECTS

In my opinion, the greatest weakness of the proposal concerns cumulative impact assessment.

Marine developments cannot properly be assessed in isolation.

The West coast is now subject to an increasing number of offshore renewable proposals.

The cumulative consequences extend beyond ecology to include:

- seascape character;
- tourism;
- fishing;
- navigation;
- visual amenity;
- community wellbeing

Incremental industrialisation can fundamentally transform regional character even where individual developments appear acceptable.

Decision-makers should therefore assess cumulative impacts at the landscape scale rather than project-by-project. I do not believe that this has been taken into account in this proposal.

5. LANDSCAPE AND SEASCAPE

The waters surrounding Mull and Iona represent one of Scotland's most iconic coastal environments.

Their value derives not simply from scenic beauty but from their universally-recognised sense of openness, wildness and remoteness.

Large offshore turbines exceeding 300 metres in height inevitably become dominant visual features, even in adverse weather conditions.

The cumulative introduction of hundreds of such structures risks permanent industrialisation of what remains one of Europe's finest coastal landscapes. Such impacts cannot realistically be mitigated.

6. CULTURAL HERITAGE

Iona is internationally-recognised for its religious, archaeological and historical importance.

The island's significance extends well beyond its scheduled monuments.

Its wider setting forms an integral component of its Outstanding Universal cultural value.

Historic landscapes must be understood as delicate, organic and ***fragile*** relationships between land, sea and history.

Introducing major industrial infrastructure into this setting risks eroding cultural significance in ways that cannot readily be quantified – and, potentially, cannot be reversed.

7. TOURISM

Tourism supports many thousands of livelihoods across Argyll and the Hebrides.

Visitors are attracted by:

- internationally recognised scenery;
- wildlife;
- tranquillity;
- dark night skies;
- cultural heritage.

These qualities represent valuable economic assets.

The Environmental Impact Assessment places considerable emphasis upon temporary construction benefits while giving comparatively less weight to potential long-term effects upon tourism. Accordingly, this project should be shelved immediately and this patent imbalance should be reconsidered carefully.

8. EFFECTS ON COMMUNITIES

If this project goes ahead, island communities will bear disproportionate environmental cost whilst receiving relatively-limited direct economic benefit.

Meaningful consideration must, therefore, be given to:

- community well-being;
- quality of life;
- recreational amenity;
- cultural identity;
- public confidence.

These matters are legitimate planning considerations and should not be dismissed as merely subjective.

9. ENVIRONMENTAL ASSESSMENT

I remain utterly unconvinced that sufficient evidence has been presented regarding:

- cumulative ecological impacts;
- long-term monitoring;
- adaptive management;
- climate resilience;
- uncertainty in collision-risk modelling;
- interactions with future offshore developments.

Environmental Impact Assessment is intended to inform decisions rather than justify predetermined outcomes – consequently, where uncertainty

remains substantial, further in-depth assessment is essential before consent is even considered.

10. PUBLIC PARTICIPATION

The Aarhus Convention emphasises effective public participation in environmental decision-making.

Applications of this scale involve many thousands of pages of technical documentation and, while legally available, such material is often inaccessible to ordinary members of the public.

Meaningful consultation requires information to be understandable as well as technically available. I do not believe that this objective has been achieved.

CONCLUSION

I believe that Scotland can and should lead a transition to renewable energy.

However, achieving net-zero ***must not*** come at the unnecessary expense of internationally-significant biodiversity, exceptional coastal landscapes and irreplaceable cultural heritage.

The Marine Directorate's responsibility is not simply to facilitate renewable energy development but to ensure that each proposal satisfies the legal tests established by Parliament.

In my respectful submission, the applicant has failed to demonstrate that:

- adverse effects upon protected species can be excluded with sufficient certainty;
- cumulative impacts have been adequately assessed;
- landscape and seascape impacts are acceptable;
- cultural heritage has been adequately protected;
- impacts upon tourism and island communities have been properly evaluated.

For these reasons, I respectfully request that Marine Licence Application 00012385 be refused.

Furthermore, should the Marine Directorate nevertheless be minded to grant consent, I submit that it would first require substantial further environmental assessment, independent review of cumulative impacts, and robust monitoring and mitigation measures capable of ensuring compliance with Scotland's environmental obligations.

Respectfully submitted,

[Redacted]

Member of the Public 4996

OBJECTION TO
MACHAIR OFFSHORE WIND FARM

S.36 # 00012385

Marine Licence # 00012386

ECU # 00004704



[Redacted]

Objection to MachairWind offshore wind farm planning application
S.36 #00012385, Marine licence #00012386, ECU #00004704

CORE ARGUMENT

- The proposed Machair offshore wind farm is a good project but in the wrong place.
- It should **NOT** receive planning permission
    - but the Scottish government should select a new location
    - at least 50 km from Iona and other inhabited islands.
- When the current location was selected in 2013, it was **NOT** expected to have a significant visual impact on Iona or the other islands.
- Since 2013, however, wind turbines have grown nearly three times taller
    - and are now visible from 50 km + away
    - but the location of the project has **NOT** been adjusted
- The ninety one turbines proposed are 1,100 feet or 335 m tall - the same as a seventy floor block of flats or the Eiffel Tower - and Iona is only 22 km away. Colonsay is even closer.
- Iona, Colonsay, Islay, Jura and the Ross of Mull would be the worst affected but the wind turbines would be visible from as far as Tiree, Coll, Staffa, Scarba and Luing.
- The visual impact on Iona of the project would be horrendous
    - undermine its scenic attractions, serenity and spiritual atmosphere.
    - damage tourism and cost possibly 90 jobs on Mull with more elsewhere.
    - damage its status of one of Scotland's major cultural and historical sites.
- In 2020 the government was told by Scottish Natural Heritage - the official body responsible for the advising it on visual impacts - that
    - the new larger wind turbines needed to be deployed further away from the coast
    - 80% of the W1 project area was therefore unsuitable.
- The government ignored or dismissed this advice and leased the area to ScottishPower in 2022.
    - without providing a public explanation of its reasons for ignoring SNH
- The great economist Maynard Keynes once said "When the facts change, I change my mind - what do you do, sir?".
    - The response in this case appears to have been to "Ignore them".

FORMAL OBJECTIONS

We object to the Machair wind farm proposal.

Our objections are laid out in the following pages but we would like to emphasise, in particular, that we object that the applicant, EIA or other supporting material:

- Understate materially the daytime visual impact on Iona as "moderate"
    - the impact is not "moderate" but dramatic and intrusive as the photomontages demonstrate
- Also understate materially the nighttime visual impact on Iona
    - the nocturnal photomontage uses lights 90% less bright than actually anticipated
- Seek to remove the visual impact on Iona from consideration by arguing that there is no requirement to consider the impact on regionally designated "Areas of Panoramic Quality" (APQ) as opposed to nationally designated "National Scenic Areas" (NSA).
    - This is wrong in law and planning guidance
- Completely fail to grasp the cultural, historical and religious significance of Iona.
- Dismiss the impact on tourism on Iona and Mull as "minor adverse" and "not significant"
    - our analysis suggests that potentially more than 90 tourist related jobs could be lost on Mull
- Reveal an irrational persistence with the current location from 2013 to 2026 despite
    - a near tripling of the height of the proposed wind turbines to 1100 feet or 335 m.

/

    - the consequent visual impact on Iona and other islands shifting from minimal to material
    - the availability of alternative sites
- Fail to explain the inconsistent policies being pursued off the East and West coasts of Scotland.
    - the last time an East Coast offshore wind farm closer than 30 km got consent was 2014
- Fail to acknowledge the risks to the overall Net Zero program from persisting with this flawed project
    - judicial review / statutory challenge
    - possible tipping point in public attitudes to Net Zero program in reaction to clearly unreasonable and defective decisions leading to incredulity and then potential disillusion.

For further detail on these and other objections please see the rest of text.

CONTENTS

Introduction 5

1. Visual impact 6
2. Cultural and Historical Heritage 10
3. Tourism and Employment 12
4. The choice of location 15
5. Alternative locations 23
6. The outcome: inclusion in ScotWind Round 24
7. Assessment of W1 MachairWind project 27
8. Context of decision 29
9. Summary of rival arguments 34
10. Recommendations and Conclusion 36

Attachments

A. Increased height and visual impact of offshore wind turbines 38
B. Scottish Natural Heritage advice in 2020 50
C. Alternative locations 54
D. Tourism and employment on Mull and Iona 62
E. Official evolution of the W1 Machair area 2011 - 26 65
F. Background and contact details of objectors 73

INTRODUCTION

We support the development of a 2GW offshore wind farm off the Argyll coast - given mclimate change and regional economic benefits - but **NOT** in the form of this specific proposal and location.

We recommend the application is **REJECTED** and **REPLACED** by a new project further offshore.

This note supplements the objections already raised by the Iona, Mull, Colonsay, Jura and Islay Community Councils on these and other issues which we endorse.

We also endorse the objections to the analogous Spiorad Na Mara project 8 km off Lewis made by the Comhairle nan Eilean Siar (Western Isles Council) most of whose legal arguments also apply to this case.

This note deals with some other issues but the main focus is on

- the initial choice of the proposed location in 2013 - when an offshore wind farm was not expected to have a significant visual impact even on the closest islands
- the seemingly "unreasonable and perverse" failure to adjust it subsequently to a location further offshore given
- the significant increase in the height and visual impact of offshore wind turbines since 2013
- the availability of new areas beyond the 12 mile limit since the EEZ was established in 2014
- the development of new techniques permitting access to areas with greater than 60m depth.
- the inconsistency in the policies being pursued off the East and West coasts

We have not commented on biodiversity, birds, the transmission bottlenecks in the Grid leading to increasing curtailments of offshore wind farms and other relevant issues since these have have been covered more than adequately by others.

Though this note is written from an Iona perspective, many of the same arguments are relevant for Mull, Colonsay, Jura and Islay and for a wider evaluation of the overall project.

[Redacted]

P.S. Apologies for any misinterpretations or errors on legal points but we were due to spend an hour checking all such issues with an Edinburgh lawyer but he cancelled the day before since he is now acting for ScottishPower.

1. VISUAL IMPACT

Summary

- The EIA is incorrect it describing the visual impact of the project on Iona as “moderate”. It would have a dramatic impact and be destructive of views of great natural beauty.

1/ The Environmental Impact Assessment (EIA) notes correctly that - though on almost all other matters the project meets the legal and policy requirements for approval - there are unavoidable negative visual impacts on various islands including Iona.

Daytime view

2/ The 335m tall wind turbines now being proposed would have a significant adverse visual impact as they would be visible from 50 km. Iona is only 22 km away from the project.

3/ The photomontages provided by ScottishPower reveal the absurdity of the claim that the MachairWind project would have only a “moderate” visual impact on Iona as asserted in the EIA (both for the Ferry and Dun viewpoints). It would have a massive impact and destroy the “panoramic” views currently enjoyed.

Photomontage of potential view from the Dun in central Iona



4/ Another simple way of making the same point is that Iona is part of an “Area of Panoramic Quality” (APQ) which is Argyll and Bute’s regional version of a “National Scenic Area” (NSA). Clearly,

“panoramic quality” is lost if a previously unspoilt vista is invaded by ninety large wind turbines. If the project proceeds, Iona will presumably lose its APQ status. This has significant planning implications.

Nighttime view

5/ Potentially, the visual impact at nighttime could be at least as disconcerting as that in the day. Flashing red lights transmitting a W morse code signal to warn off aircraft could alter significantly the view from Iona.

6/ The photomontage appears reassuring. The flashing red lights seem almost invisible. (The EIA does not include a nighttime photomontage from the centre of Iona so we have used one from the Iona / Fionnphort ferry.)

Photomontage of the night view from Iona / Fionnphort



7/ Unfortunately, the photomontage was created on the basis that the red lights were 200 candela (cd) bright rather than the 2000 cd actually anticipated. This is the difference between two hundred candles and a flashing red aircraft warning light.

8/ The intellectual rationale for reducing the brightness by 90% for the photomontage is unclear.

9/ In reality, the flashing red lights will be, if anything, more intrusive than the wind farms during the day.

10/ The company has promised to investigate mitigation but made no hard commitments. Air safety rules tend to be inflexible.

Non mechanical effects

11/ The above analysis, however, misses a major point. Visual impact is not just a matter of distances and lines of sight but of the sensation the scene observed produces in the observer. There is a difference between looking at the Alps and an industrial wasteland even if both are the same distance away.

12/ In this case - as Historic Environment Scotland (HES) patiently explained on several occasions to the engineering consultants Haskoning who were compiling the EIA - Iona's atmosphere and ambience depends on

"… a sense of place and isolation derived from being set on the edges of landforms and a relationship with the wide open sea … Their sense of place derives from being 'on-the-edge' exposure to the sea and a level of perceived wildness … It is not possible to establish from the wireline alone whether the severity of this impact would likely raise issues of national importance such that we would object."

Haskoning seems to have been unable to grasp this viewpoint. This is another defect of the EIA.

Conclusion on EIA

13/ The EIA analysis is defective. The visual impact is dramatic and intrusive not "moderate" both during the day and at night. The sense of being in a remote secluded location on the "edge of the world" would be lost. We object.

14/ In normal circumstances this alone should prevent approval of the MachairWind project but it is argued in the EIA that the government's policy of increasing offshore wind power as part of the wider "Net Zero" program justifies overriding these concerns.

See attachment A for fuller assessment of the visual impact of 335 m tall wind turbines at various distances in the context of the unpolluted atmosphere in the Hebrides.

Visual impact: unusual manoeuvres

1/ The applicant is clearly acutely sensitive to the challenge to planning approval represented by the visual impact on Iona and has sought to reduce its importance in the EIA and elsewhere.

2/ In particular, it is aware of the official advice from Scottish Natural Heritage or SNH (now NatureScot) in 2020 which emphasised the visual impact on Iona and the Paps of Jura when concluding that wind farms should be banned from 80% of the W1 area (even if Scottish Ministers overruled SNH at that time).

3/ One way that the applicant has sought to minimise the importance of the visual impact on Iona is by

- suggesting that only the impact on National Scenic Areas (NSA) and not that on "Areas of Panoramic Quality" (APQ) should be considered.

- Since Iona is not in a NSA but "only" in an APQ this would solve their problem

- In the meantime the inaccurate claim that Iona was not "designated" allowed a reduction in the assessed signing since of the impact on Iona in the EIA

4/ Another statutory consultee, Argyll and Bute County Council, has - according to the EIA - decided to defer to NatureScot on these issues, partly because it has no in-house landscape expert, so NatureScot effectively has two "votes".

5/ The applicant arranged a series of "collaborative workshops" with NatureScot - which it recorded and minuted - hoping to induce them to disown the 2020 recommendations on the record, to endorse the removal of APQs from consideration and to various other points.

6/ The EIA claims this effort was successful but the minutes are not as clear. The minutes of one key meeting are absent. We will discover the real outcome when NatureScot reveals whether it plans to object.

7/ We object to attempts to manipulate statutory consultees and undermine the integrity of the process.

Visual impact: Are "Areas of Panoramic Quality" (APQ) protected in this instance?

1/ If the application was being assessed under the normal planning system, the situation would be unambiguous. The APQ designation would impose a very high bar for development.

2/ As it is being processed via the Section 36 machinery, the applicant believes that the APQ designation is irrelevant.

3/ We think this is incorrect partly because of the planning guidance but mostly because ultimately the application is being assessed under the Energy Act of 1989 which places a duty on Scottish Ministers to assess the impact on areas of natural beauty irrespective of whether in a NSA, APQ or indeed in an undesignated area.

4/ We object to the attempted exclusion of Iona's APQ status from consideration.

Summary of objections in chapter 1

1/ We object to

- the various ways in which the EIA seeks to understate the impact on Iona
- the attempts to manipulate the statutory consultees
- the attempt to exclude Iona's APQ status from consideration of the application.

For detail see main text.

2. CULTURAL AND HISTORICAL HERITAGE

Summary

- Iona is one of Scotland's major historical and cultural sites.

- Visitors' experience of this heritage is enhanced by the unspoilt environment which makes it easier to imagine and understand how life must have been fourteen hundred years ago.

1/ Iona has been a religious centre since St Columba arrived in 563. Over that period it has been universally respected - apart from a few Viking raids - as a special place whose remoteness, serenity and scenery have created a deeply spiritual atmosphere which should be treasured and protected.

2/ It has been occupied by a series of religious communities

563-807 Celtic monastery - One of the two great intellectual powerhouses of Irish monasticism. Produced the Book of Kells. Converted the Picts and Northumbrians. Leader of a wide network of daughter monasteries in Scotland and Ireland. Abbots such as Columba and Adonman.

807-1204 Ascetic hermits - After a Viking raid killed sixty eight monks in 806, most of the survivors and the relics were transferred to Kells and Dunkeld. A small community of monks remained but became more like a community of ascetic hermits probably including Culdees. A milestone occurred in 980 when Olaf Sitricsson, the Norse-Gael King of the Isles, retired there as a penitent pilgrim. He was later buried on Iona as were other Kings of the Isles and, it is believed, early Kings of Scotland.

1204-1560 Benedictine Abbey and Nunnery - Catholic monastery sponsored by the MacDougalls and then the MacDonald Lords of the Isles. The most important religious centre in the Hebrides. Burial place of the MacDonald Lords of the Isles and other Clan chieftains.

1560-1938 Abandoned - The Reformation led to the dissolution of the monastery.

1938 - 2026 Iona Community - Founded by Rev. George Macleod who had a vision of "faith grounded in action" which led him to organise trainee ministers, unemployed Glaswegians and others to restore Iona Abbey and the associated living spaces during the late 1930s and the 1940s. The Iona Community now has 200 full members, 2,000 associate members and global outreach. Though not a traditional monastery, it is a religious community inspired by its Columban and Benedictine predecessors and with clear rules.

3/ Today, the restored Abbey, the ruins of the Nunnery, other historic buildings and the Museum - with its well displayed and impressive collection for a regional museum - make Iona one of the greatest historical attractions in Scotland. Though it may not get the visitor numbers of Stirling or Edinburgh castles given its remoteness, it is just as important as the only major site from the period before Scotland or Alba was established c. 900.

Engineering consultant / cultural significance disconnect

4/ It should be noted that NPF4 stresses the importance of an understanding of the cultural significance of sites potentially impacted. It is not clear that Haskoning, the engineering consultants compiling the EIA, has achieved this.

- HES comments on the monastic settlement on Iona included " … It is the birthplace of Scottish Christianity and internationally renowned for its surroundings and spiritual associations." and that the wind farm project "… makes them [HES] nervous as it is a site of international importance and is a site of pilgrimage still in the modern day noting that people go because of the location".

- The same issue was summarised in the EIA by Haskoning as "In all cases where WTGs [turbines] are visible in simultaneous views with the Abbey, the Abbey would remain the visually dominant focal point of views.The presence of the WTGs in the distant seascape would not detract from those key aspects which contribute to its cultural significance."

- Haskoning went on to judge the magnitude of the change was "low adverse" resulting in "moderate significance". These may be minority views - or even unique to Haskoning. It is a defective judgment.

Interaction with visual effect

7/ For the historically minded visitor, wandering around Iona is more than visiting some buildings but an evocative experience where the history, the buildings and the largely unchanged scenery and views combine to allow him or her to reenter the past.

Conclusion

8/ The above indicates the EIA was defective in its analysis of

- the importance of the cultural and historical heritage of Iona

- the impact of the project on visitors' experience of that cultural and historical heritage

We object on both grounds. See text for more detail.

3. TOURISM AND EMPLOYMENT

Summary

- Damage to the "Iona experience" may lead to reduced visitor numbers to Mull and the potential loss of an estimated 90 jobs on Mull and Iona.

- The wider impact on scenery based tourism on Mull and the other islands may add another 165 potential job losses.

- The EIA fails to acknowledge this impact.

1/ The EIA fails to explore the knock on negative effects of the visual impact on tourism which it accepts exist but describes the impact as "low".

2/ It quotes research by Oxford Brookes and BiGGAR Economics suggesting there was no link between wind farms and tourism

- The claim by OB that tourists in Great Yarmouth, Brighton, etc were relatively unbothered may be correct - though we are sceptical - but visitors to cities and towns have different expectations to those visiting the Inner Hebrides

- The BiGGAR Economics research was paid for by the applicant - probably as part of the East Anglia One project. It therefore faces a credibility issue. It is also true that EA 1 is 43 km offshore not 22 km.

2/ We believe the applicant is incorrect. Iona is one of the two most important tourist attractions for visitors to Mull. In summer coach loads of day trippers arrive daily from Oban via Craignure and it is estimated Iona receives over 130,000 visitors in total in a normal year i.e. when CalMac is not disrupted.

3/ Some of the visitors are attracted purely by the white beaches, scenery or historical heritage but others focus on the spiritual and religious aspects of Iona. It is a major centre of global pilgrimage, including from North America, and is the western terminus of "Columba's Way", a pilgrimage route starting in St Andrews. The pilgrims are attracted by the serenity, scenery and seclusion of Iona as well as the history of the Columban, Benedictine and ecumenical communities. A backdrop of an industrialised seascape is not compatible with this.

4/ Back in 2011, officials thought the greatest financial downside of offshore wind power off Argyll would be the impact on tourism which was expected to be far larger than that on fishing, shipping or other elements. They estimated the impact would be up to £3.4 m per annum. This figure was for the whole West Region but it makes one sceptical of the EIA view that the impact on Iona and Mull will be negligible.

5/ By 2020, however, officials had revised their opinion and now saw "the most significant cost [as being] to the recreational angling sector, however, commercial fisheries, particularly static gear, may also be impacted by development". It is not clear why they now chose to ignore the impact on tourism.

6/ Mull tourism is the largest employer on the island with an estimated 600 individuals directly employed in the sector out of 1900 economically active individuals and a total population of 3,063. It is already suffering from the well known Calmac ferry problems caused by unfortunate procurement decisions. Ferry trips now usually have to be booked weeks in advance. Visitor numbers are down and

businesses have been forced to shut or contract. If, in addition, Iona lost its much of its current attractiveness because of the MachairWind project, Mull tourism would experience a "double whammy".

7/ A tentative estimate would be that if tourist visits to Iona fell by a third then overall visits to Mull might fall by 10% leading to the potential loss of 90 jobs.

8/ Other visitors to Mull may not be interested in visiting Iona but be put off by the changed view from the southern and western coasts of Mull. This may apply especially to the self catering cottage, hotel and B&B segments. This might lead to a further 5% reduction in visitor spend leading to a further 45 jobs

9/ Similar considerations would apply to the other islands, which also depend on scenery based tourism, leading to an estimated further 120 job losses if one assumes 10% impact and extrapolates using the population of the various islands.

	Population of severely affected Islands
Islay	3,200
Jura	200
Colonsay	140
Sell and Luing	300?
Total	3,840?

10/ Scottish Ministers will, of course, have to balance

- the short term stimulus during the construction phase vs. the longer term effects
- the economic impact on Mull and the other islands vs. elsewhere in Scotland

11/ But purely in terms of long term employment the trade off may be

	Gain / Loss in long term employment
Iona related loss on Mull	- 90?
Impact on views from Mull	- 45?
Impact on other affected islands	- 120?
Total local adverse impact	- 255?
Rest of Scotland: project benefits	+ 390
Net impact	+ 135?

These are obviously just guesstimates but they are sufficient to indicate that officials were correct in 2011 to see the impact on tourism as the main negative economic impact and that both officials in 2020 and the EIA in 2026 are in error in ignoring its significance.

10/ Given the fragility of island economies, the significance of job losses on Mull and on the other islands should not be understated. The loss of a 100 jobs in Glasgow might be regarded (using the EIA methodology) as "negligible" but the loss of 100 jobs on Mull would feel like a major blow.

Conclusion

11/ The conclusion remains that the EIA analysis of the negative impact on tourism was defective and understates both it and the employment consequences. We object.

See attachment D for fuller discussion of tourism on Mull and employment.

4. THE CHOICE OF LOCATION

Summary

- When the W1 Machair block was first delineated in 2013, wind turbines were much smaller and no significant visual impact on the islands was anticipated.

- By 2020 - when the selection of the W1 Machair block was confirmed despite SNH's protests - they were expected to be over 200m tall and SNH recommended that 80% of the block was no longer suitable for wind turbines of this size.

- Today in 2026 they are 335m tall and the project needs to be relocated.

- The failure to relocate earlier may possibly have been caused by institutional inertia and/or an unwillingness to challenge a previous decision in a "plan-led" program and/or commercial pressures and/or a disinclination to apply the same standards and policies to the East and West coasts

- There is a clear inconsistency between this proposal and the policies being pursued off the East Coast where

    - new projects are being placed more than 30 km from the coast

    - no project less than 30 km offshore has been approved since 2014 off the East Coast

    - Iona is 22 km and Colonsay only 12 km from the W1 Machair project

1/ As the EIA observes correctly - and repeatedly - the undoubted severe negative impacts on Iona and the other islands are inherent in the location of the project which, as the applicant is keen to point out, was chosen by the Scottish government and not by the company.

Emergence of issue

2/ The location was first highlighted officially in 2011 and took on more or less its current form in 2013.

3/ It has had different names at various points but from 2020 has been known as the "W1" Plan Option or, more recently, the W1 MachairWind project.

4/ In 2013 it was not expected that an offshore wind farm would have a significant visual impact on the closest islands or necessarily even be visible. The working assumption was probably that a 15 km distance was sufficient.

5/ Since 2013 the typical height of new offshore wind turbines has increased from 120m to 270m.

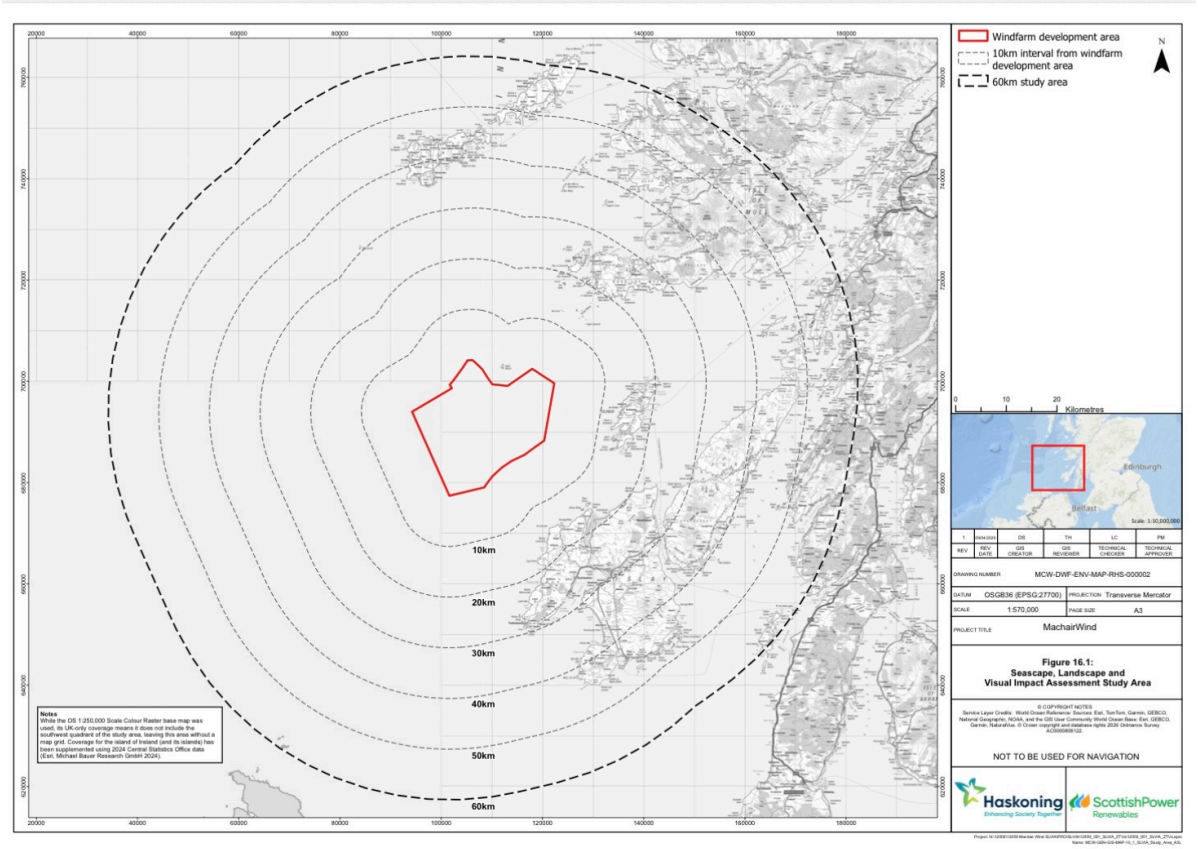
6/ The applicant is now proposing ninety one 335m turbines for the W1 MachairWind project (with a possible but less likely variant of 144 turbines 260m tall).

7/ As a result, the distance from the coast required to avoid significant visual impact has increased from 15 km to 50km.

8/ Under the current plan, Iona will be 22 km - and Colonsay only 12 km - from the W1 MachairWind project. As the photomontages demonstrates, the consequences are horrendous and, in normal circumstances, would suffice to ensure rejection.

9/ The map portrays the extent of the visual impact of the proposed project. Iona, Colonsay, parts of Islay and the Ross of Mull are within 25 km of the project and are the worst affected but Jura, Tiree, Staffa, Luing and additional parts of Islay and Mull are all also within the 50 km impact zone.

Visual impact zone of the MachairWind project



Source: EIA

10/ It should be noted, however, that there is no universally accepted approach to defining the maximum distance for significant visual impact and no coherent official policy.

See Attachment E for the official evolution of the area and its boundaries since 2011.

See attachment A for fuller discussion of increased wind turbine heights, their visibility and the rationale for the 50 km figure.

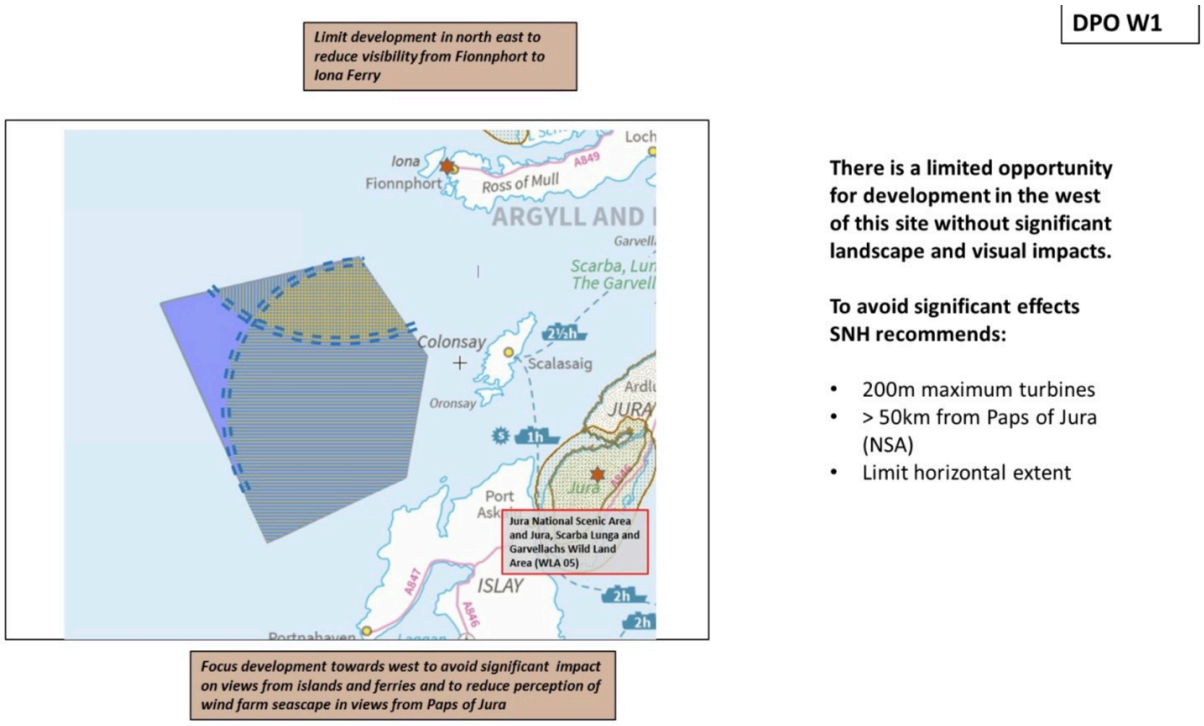
Scottish Natural Heritage (now NatureScot) intervention

1/ The official body responsible for advising the Scottish government on these issues was Scottish Natural Heritage or SNH (now NatureScot).

2/ In March 2020 SNH recognised these challenges in its response to the Sector Plan consultation and formally advised the government that

- the height of wind turbines in the W1 area needed to be limited to of a maximum of 200m but, even so
- wind turbine deployment should be restricted to the 20% of the original area in the north west corner of W1. See diagram.

Formal advice in 2020 from SNH - the official advisory body



Source: SNH response to consultation on Sector Plan 2020

3/ SNH further advised that

- If the government permitted wind turbines that were 300m tall they needed to be 45+ km away from Iona and equivalent APQ sites (and 50+ km away from the Jura NSA).
- For the proposed 335m turbines the equivalent figure would be 50+ km.
- Either way, this advice was incompatible with the deployment of ninety one 335m tall wind turbines within W1's existing boundaries.

4/ The thrust of SNH advice was ignored or dismissed.

5/ As "mitigation", some changes to the borders of W1 were recommended by the Marine Directorate in 2020. See map below.

- Ironically the largest reduction to the size of W1 were precisely in the 20% which SNH had no objection to

- Otherwise, the reductions appear to bear no relation to the SNH arguments and recommendations

- It is possible that by trimming W1 all round officials believed they could respond to any challenge by claiming they had "mitigated" the adverse effects.

- For Iona, the benefit was minimal. If one accepts SNH's view that the turbines needed to be 45 or 50 km away then trimming the distance by 2-3 km bordered on irrelevance.

The trimming of W1 in 2020 - detail from larger map



Source: SMP-OEW 2020

See Attachment B for fuller discussion of SNH's recommendations.

Assessment of decision

1/ At this point, a rational decision would have been to either abandon the W1 location or to seek to relocate it further offshore to reduce the extreme SLVIA / visual impact issues.

2/ The failure to do either was "unreasonable and perverse".

3/ The great economist Maynard Keynes once said “When the facts change, I change my mind - what do you do, sir?”. The overall response in this case appears to have been to “Ignore them”

See attachment A for fuller discussion of increased wind turbine heights, their visibility and the rationale for the 50 km figure.

See attachment B for fuller discussion of SNH advice

See Attachment E for the official evolution of the area and its boundaries since 2011.

Causes of failure to adjust location - inertia, inflexibility or is the policy for the West Coast inconsistent with policy for the East Coast?

1/ It is possible that this seemingly inexplicable sequence reflected some or all of the following:

- there has been a degree of institutional inertia over the location since the initial decision in 2011/13
- the insistence that offshore wind farms were a “plan led” program may have made it professionally imprudent to ever question an area already designated for development.
    - Even SNH - which seems to have been an unusually independent and robust institution at that date - was careful not to suggest abolishing or relocating W1 per se but only that 80% of W1 was unsuitable.
- the decision making structure had become so complicated and spread over multiple organisations so that no one individual could see “the wood for the trees” except SNH
- commercial or revenue factors were overriding sound planning and common sense
- deliberateLy lower standards for the West Coast than are embraced off the East Coast.

2/ Although not stated explicitly - beyond a few hints as above - there seems to be a rule of thumb or norm usually applied off the East Coast. This used to be that offshore wind farms should be a minimum of 15 km away from the coast but this appears to have changed in the mid 2010s to 30 km as four recent approvals by the Marine Directorate suggest .

Project	Number and height of turbines		Distance from shore
Caledonia North and South 2GW	150	355m	35 km
Berwick Bank 4 GW	307	355m	38 km
West of Orkney 2 GW	125	360m	30 km
Salamander Floating 100 MW	7	250m	35 km

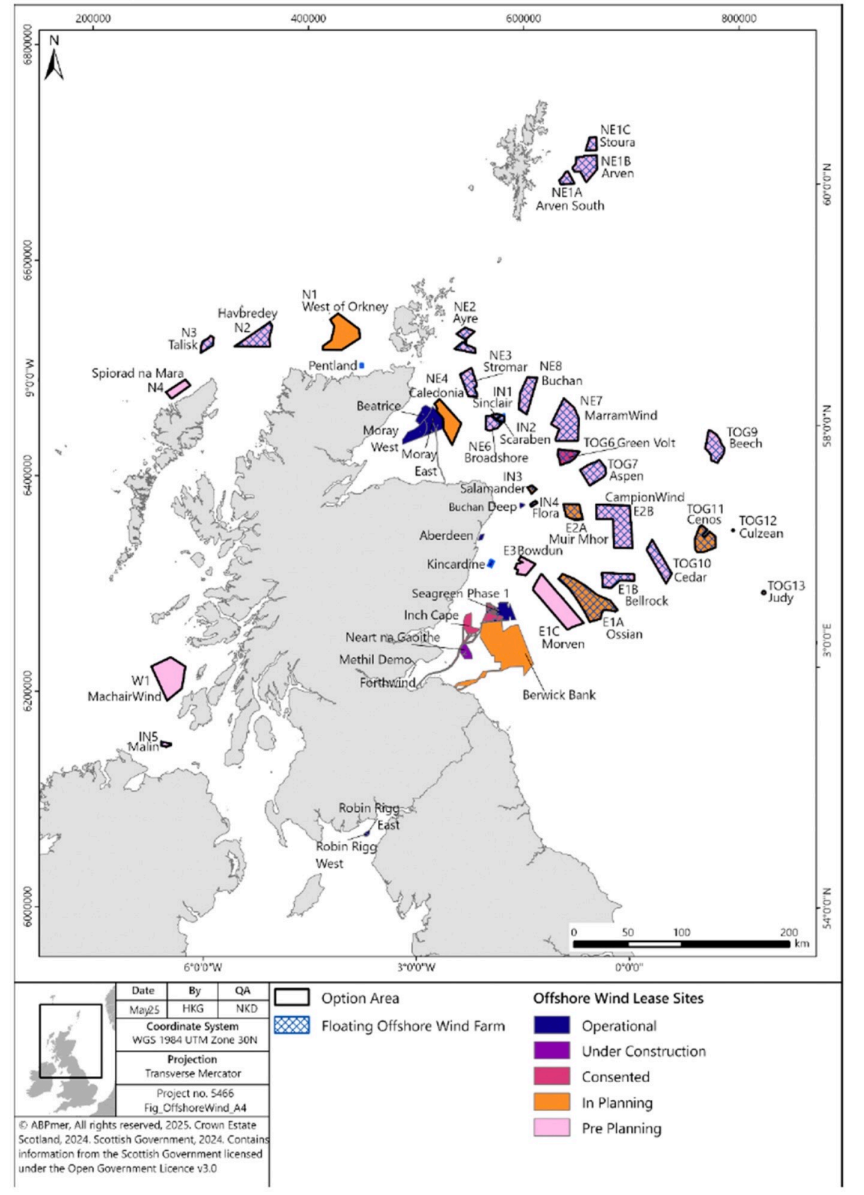
3/ In 2024 the Inchcape and Neart na Gaoithe projects were the last significant East Coast projects less than 30 km offshore to get approval.

4/ This post mid 2010s norm does not, however, seem to have been applied to the two West Coast projects currently seeking approval.

Spiorad Na Mara (Lewis) 900 MW	60	338m	6 km
MachairWind 2GW	91	335m	13 km

5/ A glance at the map demonstrates the anomalous status of the proposed W1 Machair and N4 Spiorad na Mara projects when compared to recent approvals off the East Coast.

Operational and proposed Scottish offshore wind farms 2025



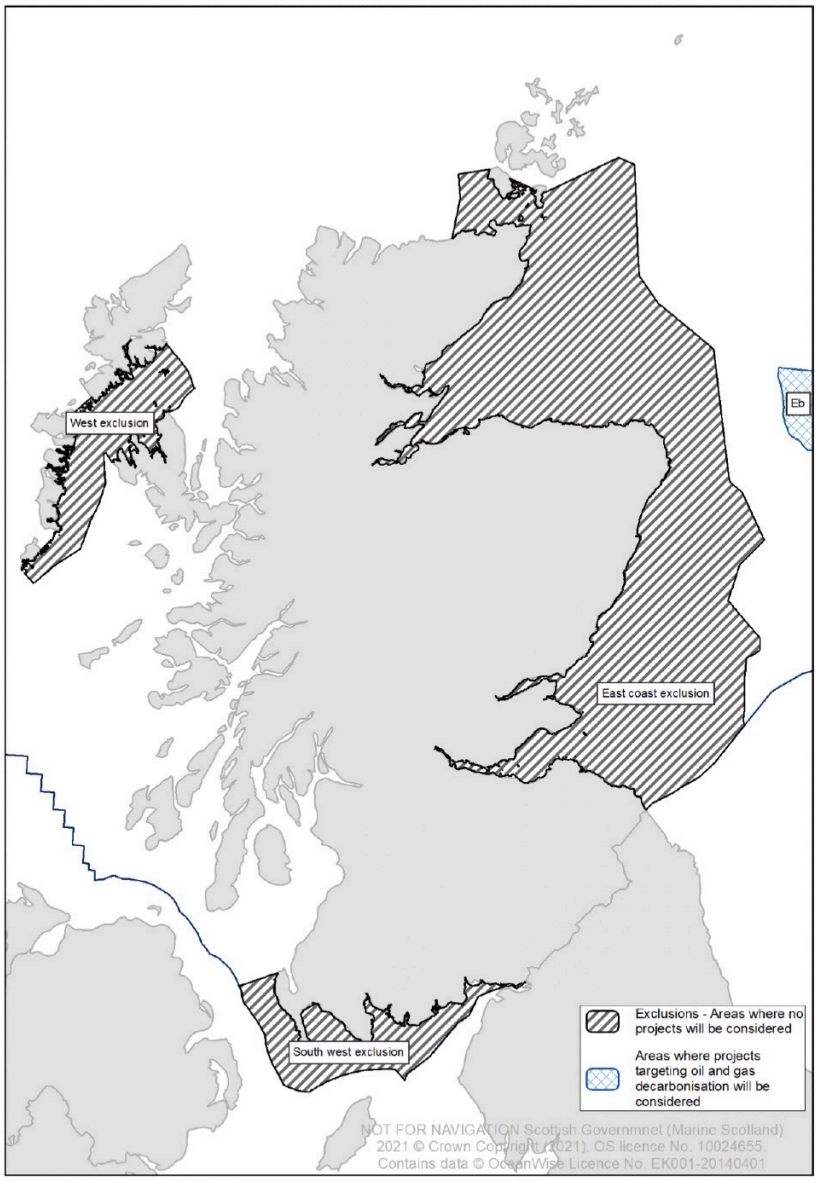
Source: Sectoral Marine Plan

6/ It appears there was and is one set of rules for those living on the East Coast and another for those living on the West Coast. This is unacceptable and we object. What is acceptable for the inhabitants of Edinburgh and Aberdeen should, for consistency, also define what is acceptable for the inhabitants of the Inner Hebrides.

7/ More recently, the 2022 INTOG program has displayed the same difference in attitude to the West and East Coasts - even if the exclusion zones are justified by a number of factors not just visual impact.

INTOG exclusion zones

Figure 8: INTOG Exclusions - areas where no activity will be considered



Source: Source: Sectoral Marine Plan for Innovation and Targeted Oil and Gas (INTOG) Decarbonisation 2022

Conclusion

20/ The objections that arise in this chapter are:

- the failure to relocate the project as wind turbines tripled in height
- the rejection of SNH's logical advice (without published rationale for so doing)

- the irrational or unreasonable decision making inherent in these failures
- the failure to conform with this application to the policies clearly being pursued off the East Coast

For detail see text.

5. ALTERNATIVE LOCATIONS

Summary

- When the location was first identified in 2011, the choice was restricted by the 12 mile limit. Now there are many more locations in the EEZ available. In addition, new techniques permit access to areas with greater than 60 m depth.

- Given the increased height of wind turbines, the logical adjustment was and is to move the project further offshore

- There are three obvious alternatives

1/ There are different options for moving further offshore with various advantages and disadvantages. If one is seeking to define a zone which is at least 50 km from inhabited islands, the three most obvious alternatives are:

- Moving W1 to the south west where water depths and the sea floor are similar to the existing W1 bloc permitting the use of the same fixed wind turbine approach as currently proposed.

- Moving W1 a significant distance to the west / north west where water depths are greater and a floating wind turbine approach would be needed (as in Iberdrola / ScottishPower's 3GW project off Aberdeenshire which is 75 km offshore in waters of 110m depth and is also currently seeking planning approval).

- Replacing the 2 GW of offshore energy anticipated from W1 off Argyll with a new area off the north coast of Scotland or in the North Sea. If Iberdrola wishes to invest another £8bn in Scottish offshore wind farms, one suspects a way could be found to accommodate them somewhere. There are a few unclaimed areas left over from the ScotWind leasing round or new areas could be demarcated.

2/ The third option would be tantamount to saying that at present - given current technology, costs, prices and legal constraints - it is not possible to establish an offshore wind farm off Argyll. This would be a controversial view but, even if true, this would be only a temporary pause since costs are projected to decline materially by the mid 2030s.

3/ In the longer run, if a significant wind power province is to be opened up in the West Region it is likely to centre on multiple floating wind farms south west of Barra and South Uist. Such a province seems likely to develop sooner or later. It may make more sense than a solitary fixed wind farm off Iona and Islay.

Conclusion

4/ This section gives rise to no new objections but supports those elsewhere relating to the irrationality or unreasonableness of failing to adjust the location.

See attachment C for fuller discussion of alternative locations and possible revised strategic approach to West Region.

6. OUTCOME: INCLUSION IN SCOTWIND ROUND

Summary

• Inertia won.

• The area chosen in 2013 rolled on despite the change in circumstances.

• W1 was awarded to Iberdrola / ScottishPower in the 2022 ScotWind round.

1/ In October 2020 the new Sectoral Marine Plan for Offshore Wind (SMP-OWE) was published.

- It dropped two other areas but kept the W1 block. (The "SW1" block off Galloway was eliminated explicitly largely because of the strength of objections to the visual impact. The other was more about fishing.)

- It trimmed the boundaries of W1 in line with the recommendations of officials not SNH

Lack of rationale for rejecting SNH advice

2/ In the "Sectoral marine plan for offshore wind energy" (SMP-OWE) and the supporting "Sectoral marine plan: islands communities impact assessment" there were only a few relevant comments.

"Amendments have been made to the boundaries of 3 DPOs included within this ICIA – W1, NE1 and NE2. The boundary amendments have been made to mitigate potential negative impacts on the commercial shipping and commercial fishing sectors."

"The boundaries of W1 have been reduced to increase the distance to shore and mitigate the potential negative impacts on commercial shipping (along the western boundary) and seascape, landscape and coastal character (eastern and northern boundaries). This has resulted in a reduction of 32% of the total seabed area."

These are inconsistent - seascape etc visual impacts are not mentioned in the first comment - but presumably the second version was the official position..

3/ The 32% figure may be right though eyeballing the map suggests something closer to 20%**.**

4/ Officials summed up the situation going forward as

"… There would be the potential for adverse visual impacts and impacts on seascape and landscape character, due to the proximity of the PO to shore, particularly the south eastern part of the PO, however, these impacts may be reduced or avoided via project-level mitigation measures and the now increased distance from shore due to the modified PO."

which suggests perhaps that they did not understand the impact of what had just been agreed or possibly thought there was a realistic possibility of capping turbines at 200m.

5/ At no point was there a reasoned explanation of what was wrong with the logic of SNH or what the minimum distance offshore should be - depending on whether the coast was in a NSA, APQ or an undesignated area.

ScotWind and after

6/ In the 2021/22 ScotWind leasing round, the Scottish Government granted Iberdrola/ScottishPower an option on the lease on the W1 bloc with basically the same boundaries as had previously been decided. (The payment for the option was £75 m and the total capex if the project goes forward would be about £5bn.)

7/ Iberdrola/ScottishPower is now seeking planning permission to develop W1 with a planned ninety one 335 m wind turbines via a subsidiary called MachairWind Ltd.

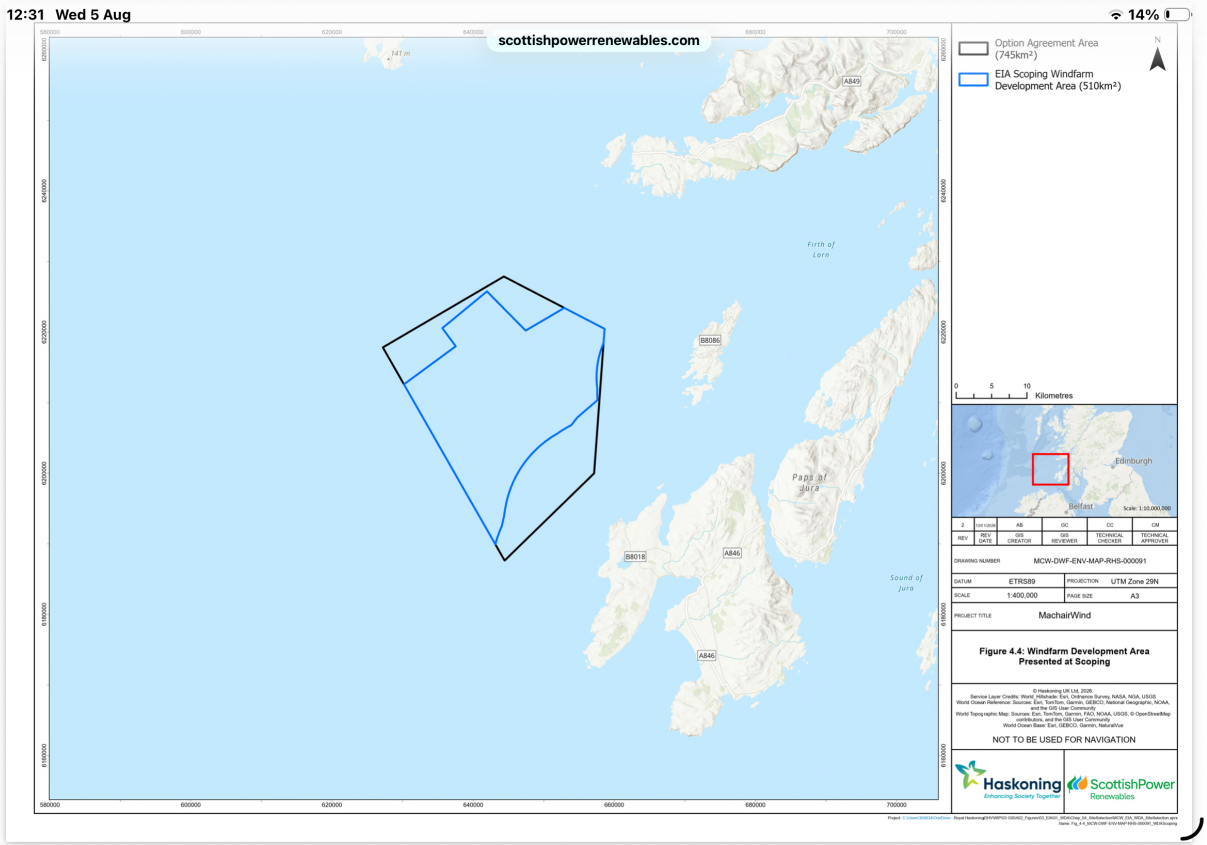
8/ The applicant seeks in the EIA to draw attention to - and take credit for - the fact that they have recently redrawn the boundaries and abandoned 40% of the leased area of W1 on the grounds.

- The NW border zone was too deep to be commercial

- The SE border was too close to Islay.

9/ These changes do not benefit either Iona or Colonsay (though they provide some limited relief to Islay and south western Jura). Iona remains 22 km and Colonsay only 12 km away from the new boundaries. See chart below.

<u>Reduced W1 area after Iberdrola/ScottishPower abandons 40% of lease</u>



Source: EIA

"Mitigating tactics"

10/ One if the most frustrating aspects of engaging with Section 36 energy project decisions, is the widespread habit of responding to any suggestion or criticism with the riposte of either promising mitigation or at least promising to investigate mitigation in the fullness of time.

11/ This usually means half promises which will not be kept or token concessions that achieve little.

12/ It seems to be that almost all parties interpret mitigation as meaning reducing an effect even if by a minimalist amount.

13/ There are three possible uses of the term mitigation in a legal context

- Reduce the impact of the adverse effect - even if by a minimalist amount
- Try to reduce as far as possible the impact of adverse effect within reasonable limits
- Deploy a mitigation hierarchy where , if possible, the aim is to go through successive stages of seeking to avoid, minimise, restore or offset the adverse effect.

14/ The energy companies and the Marine Directorate appear to use the term in the first sense.

15/ It will be interesting to see if this reaches judicial review whether the judge agrees. He might go for the third interpretation - or the second.

Objections

16/ We object to :

- lack of rational explanation by the government for the decision to ignore SNH's advice given the latter was the official body entrusted with advising the government on these issues.
- the use of "mitigating tactics" by the applicant and the Marine Directorate and their interpretation of mitigation in the sense described above.

For detail see text.

7. ASSESSMENT OF THE W1 MACHAIR PROJECT

Summary

• Good project but in the wrong place

• Should be relocated further offshore

1/ The project would undeniably contribute 2 GW to Scotland's 40 GW target for offshore wind power.

2/ There would also be clear economic benefits for both Argyll and Scotland as a whole but the reverse for Iona, Mull and the other affected islands.

3/ The adverse visual impact on Iona, Mull and the other islands would be significant in itself and have significant consequences.

4/ It would, in particular, adversely effect the tourism industry - the largest employer on Mull and the other affected islands.

5/ The failure to either cancel or move the project further offshore obviously risks being seen not only in Scotland but overseas - and especially in the USA - as an entirely unnecessary act of cultural vandalism and a gratuitous betrayal of the government's duty of stewardship of the natural beauty of the Scottish Highlands and Islands.

6/ The most significant underlying issue is whether it is necessary to sacrifice Iona in order to achieve the 40 GW target.

- Our answer in "No". What is needed is to move the project further offshore.

7/ At a wider policy level, arguably the worst possible outcome would be for the project to gain approval and proceed further since it might lead to widespread outrage both regionally and in religious circles internationally and would risk

- undermining the Scottish government's drive for 40GW of offshore wind power by
    - unsettling the existing widespread support for "Net Zero" projects by
    - suggesting the program has acquired "tunnel vision"
    - is no longer being pursued in a balanced and thoughtful manner
    - riding roughshod over absolutely all other considerations apart from "Net Zero".
    - possibly providing a tipping point in public attitudes
- damaging Scotland's international reputation especially in the United States
- end up being abandoned anyway at a later date.

8/ Legally, any attempt to grant deemed approval would be open to challenge causing delay or worse.

9/ As believers in Climate Change and the need to address it effectively, we

- agree with the need for more offshore wind farms

- think it is counter productive to proceed with this particular offshore wind farm

10/ In the Investment world, there is the concept of “zombie companies” which should have died years ago but somehow stagger on.

11/ The W1 Machair project might be regarded as having become the equivalent in the offshore energy world. It should have died - or more constructively been relocated - by 2020 at the latest.

12/ The problem with zombies is that they can do a great deal of damage if not dealt with expeditiously.

Conclusion

13/ The overall assessment of the project is negative. It should not proceed.

14/ The objections arising from this section are

- the lack of necessity to adversely impact Iona so significantly in order to achieve the 40:GW target. It is a false choice.

- the unnecessary risk of provoking a backlash against Net Zero policies

For detail see text.

8. THE CONTEXT OF THE DECISION

Summary

• There are many pressures pushing for approval but real risks in granting it.

a) Support for Climate Change policies

1/ The Scottish Government is pursuing aggressively a policy of Net Zero which includes increasing offshore wind power to 40 GW. There is widespread support across Scottish society.

2/ Support for the program is almost universal in Argyll where the hotter summers, milder winters and increasing number of violent winter storms caused by Climate Change have all been directly experienced by the local inhabitants.

3/ So far opposition in Argyll has been only sporadic, localised and in response to specific energy projects. There has not yet been any sign of the pockets of opposition coalescing into a wider movement as in the Highland Council region.

4/ Support may prove, however, to be wide but shallow as with some other popular causes. It is unclear whether it is potentially vulnerable to evidence of misuse of power. In the past, some popular causes have survived such problems but others have not.

b) Decision making system

1/ The application is being processed under Section 36 of the Electricity Act 1989 which is an unusually authoritarian mechanism allowing the Scottish government to impose its decisions on local authorities with few of the usual local democratic constraints.

2/ In England this system was dismantled in 2010 and 2016 but in Scotland it was not only retained but tightened further in 2025 - with the cooperation of the Department of Energy Security and Net Zero (DESNZ) in London which simultaneously relaxed the rules still more in England.

3/ This places considerable power in the hands of the Energy Consents Unit (ECU) and the Marine Directorate (MD) who handle onshore and offshore energy projects in Scotland respectively. It is an essentially corporatist system which ensures that the viewpoints of government and industry are well understood but not those of those affected, who may occasionally have useful insights. This less informed and unbalanced approach may lead to sub optimal policy outcomes.

4/ It is perhaps a survival from the age when society trusted public spirited civil servants and officials from state owned utilities to meet and take decisions for the rest of us. Today it can tend to empower profit driven and extremely motivated energy companies - with their lobbying and public affairs teams - and entrust them with the implementation of energy policy.

c) Policy context

1/ There is no doubt about the commitment of the Scottish Government to achieving Net Zero and increasing electricity production from offshore wind farms to 40 GW. This is fully reflected in the policy and planning guidance.

2/ What is far vaguer is how other considerations are to be evaluated and how the inevitable trade offs are to be handled. The Chief Planner in Edinburgh is rumoured to have suggested that when Net Zero was a consideration all other factors should be ignored but this was thought to be going a little too far. The law is clear that other factors such as natural beauty do have to be considered. Planning guidance reflects this and other considerations.

3/ On the visual impact of offshore wind farms, the resulting policy and planning guidance is tentative and ambiguous e.g.

- "Significant effects on landscapes and seascapes are likely for OAs located inshore and within 30 km from inhabited shorelines, particularly in regions that host National Scenic Areas".

- What this is supposed to mean for Iona which is 22 km away and in an area of outstanding beauty - but only a locally designated APQ not a nationally designated NSA - while undeniably vulnerable to a dramatic adverse visual impact is extremely uncertain.

4/ The Marine Directorate says it has no fixed rule but judges each project on a case by case basis.

5/ No planning system is perfect but there is a growing perception that the Energy Consents Unit (ECU) and the Marine Directorate (MD) are no longer acting as traditional planning officials weighing evidence impartially and making recommendations accordingly but instead as the uncompromising and zealous enforcement arm of Ministers' current policy.

6/ It is possible, however, that a slightly more flexible attitude is emerging. The Marine Directorate's terrestrial equivalent the ECU has had a reputation for being a brutally effective steamroller which has pushed through 97% of its projects despite frequent local opposition. It is still capable of operating in a high handed fashion (e.g. it recently reacted to an attempt by Argyll and Bute Council to hold a hearing into a controversial proposed battery farm in Taynuilt by immediately approving the project) but in two recent cases - dealing with large onshore wind farms near Tarbet and Moffat - it actually responded to objections by rejecting the schemes.

d) Political context

1/ There is widespread public enthusiasm across Scotland for both Net Zero and increased offshore wind power.

2/ The SNP and Greens are particularly committed. They tend to be intolerant of dissent on Net Zero issues and almost any disagreement - even when reasoned and on limited implementation issues - is often denounced in vehement terms.

3/ In 2025 over fifty community councils in the Highlands Region got together to complain about the tidal wave of new energy projects being rammed into their areas by ECU and to request a pause to allow a degree of local input. The Scottish government reacted with disdain. When an MSP tried to raise the questions posed in the Scottish Parliament, the Cabinet minister responsible refused to appear in person and left the response to a junior minister from another department.

4/ Equally, even the most laudable and energetically pursued campaign can reach a tipping point if it is pushed beyond the limits of common sense e.g. sending rapists to women's prisons led to a sudden shift towards increased caution on trans issues. It can only require one clearly bizarre decision to provoke incredulity and then crystallise widespread but previously ill defined unease.

5/ The best example is the events in France in 2018-20. President Macron pursued strong green policies until he encountered an explosion of rural unrest. The straw that broke the camel's back was an increase in diesel prices though the issues were clearly far deeper. Farmers drove their tractors to their local towns then nearby cities and finally Paris. The public supported them. Macron - normally considered a proud and inflexible individual - was forced to back down, shift policy and go on a national humiliation tour to listen to rural complaints. One hopes the First Minister does not have to suffer a similar ordeal.

e) Legal context

For more detailed legal analysis, see either the Iona Community Council objection or the Comhairle nan Eilean Siar (Western Isles Council)'s objections to the application for the offshore wind farm off Lewis. Available at https://www.hebrideanhorizon.co.uk and https://www.cne-siar.gov.uk

1/ Although in reality Scottish Ministers may base their decision on policy and political grounds, they will need to articulate their decision in conformity with legal requirements.

2/ In broad terms, the focus may be on the relative weight they place on increasing offshore wind production and preserving Iona - and whether it is truly necessary to choose between the two.

3/ In more detailed terms, the discussion may rapidly descend into a debate on the relative weights to be attached to the objectives and obligations embedded in various policy statements e.g. the Sector Marine Plan, planning guidance e.g. NPF4 and laws e.g. Electricity Act 1989 and the Marine (Scotland) Act 2010.

4/ The bottom line is that Scottish Ministers will have enough legal room for manoeuvre to conclude either way.

5/ Scottish ministers may find, however, that if they grant deemed approval to the MachairWind project under the Electricity Act of 1989 they face a material risk of defeat legally.

6/ Applications for Judicial Review or Statutory challenge can be on four main grounds: illegality, irrationality, procedural impropriety or breach of human rights. Judgement depends on the legal points not the merits of the case. (We object to the application on many of the same issues on both procedural and merit grounds.)

7/ Illegality - possible grounds

- Frequent issues are that a public body acts ultra vires or misdirects itself on legal point. Possibilities include e.g.

- The applicant is seeking to exclude consideration of the visual impact on Iona on the grounds it is in an APQ and not a NSA. This appears wrong in law and planning guidance. If Scottish Ministers go along with the applicant's approach then grounds for statutory challenge / judicial review would exist.

- Any failure of Scottish Ministers to consider relevant factors e.g. the visual impact n Iona at day or night or the economic impact on Mull tourism

- Mitigation can be defined three ways. The applicant and the Marine Directorate are using the most minimalist. If Scottish Ministers endorse this view, it could provide grounds.

- The use of Section 36 of the Electricity Act by Scottish Ministers has grown so arbitrary and capricious - and creates such perverse incentives encouraging unethical behaviour - that it is contrary to fairness, natural justice, normal local democratic constraints and the rule of law.

8/ Irrationality - possible grounds

- The test is the Wednesbury standard of reasonableness which asks whether a decision "is so outrageous in its defiance of logic or of accepted moral standards that no sensible person who had applied his mind to the question to be decided could have arrived at it". e.g.

- We clearly believe the decisions on the location of this project have been illogical given:

    - Schedule 9 of the Electricity Act of 1989 requires Scottish Ministers to

        "… have regard to the desirability of preserving natural beauty … and of protecting sites, buildings and objects of architectural, historic or archaeological interest."

        " … do what he can to mitigate any effect the proposals would have on the natural beauty of the countryside … "

    - It is undisputed that the project would have a significant adverse visual impact on the natural beauty etc of Iona and the other affected islands (as well as other negative impacts).

    - The formal advice given by SNH in 2020 that turbines should be limited to a height of 200m and even then confined to the north western 20% of W1 if significant landscape and visual effects were to be avoided

    - The availability of other sites further offshore suitable for wind farms means that the 40 GW target does not necessitate that implementation of this specific proposal in this specific location to succeed.

- It is unreasonable to pursue one policy on the East Coast and another on the West Coast.

- The bar is, however, set very high. A decision has to be seen as very irrational indeed for a judge to conclude it is legally unacceptable when taken by Scottish Ministers and/or the Marine Directorate.

9/ Procedural impropriety - possible grounds

- Frequent grounds are apparent bias or the "right to reasons" e.g.

- Though formally the application is coming from a company, in reality the negative impacts arise from the location which was selected by the Marine Directorate / Scottish Ministers, who may now be required to sift through the arguments and evidence to determine whether they should overrule their own decision i.e. they will be marking their own homework and might display signs of apparent bias.

- The lack of a published rationale for rejecting SNH's recommendations in 2020.

10/ Human Rights - possible grounds

- There is no end to the inventiveness of lawyers in generating cases linked to human rights but the most likely relate to apparent n bias or discrimination e.g.

- There is a clear inconsistency between the policies pursued on the East Coast vs West Coast reflecting perhaps apparent bias and discrimination against those on the West Coast and/or more specifically Argyll.

11/ We also note the recently established precedent of *Raeshaw Farms Ltd v Scottish Ministers (2026)* means that it would be legally hazardous for Scottish Ministers to grant deemed approval before the applicant produces a parallel application for the South Ayrshire grid connection.

Conclusion

12/ For ease of reference, the main objections in this chapter include:

- the legal status of APQs in a Section 36 process
- the different policies being pursued on the East and West coasts
- the different definitions of mitigation
- the possibility of irrationality or unreasonableness, inconsistency and/or apparent bias
- the lack of a clear and up to date policy and/or guidance on visual impact
- the operation of section 36 in Scotland
- the potential procedural impropriety of Scottish Ministers and the Marine Directorate assessing their own decisions
- potentially bringing the Net Zero program into disrepute and provoking a backlash against necessary Climate Change policies.

For details and lesser objections, read text.

9. SUMMARY OF RIVAL ARGUMENTS

1/ The applicant's basic argument in the EIA, covering letter, planning statement and elsewhere could be summarised as:

- There are undoubtedly negative impacts which would in other circumstances prevent approval
- These are the inevitable consequence of the location of W1 which was chosen by the Scottish government not the applicant
- The proposal is consistent with the Scottish Government policy and its commitment to increasing offshore wind power.
- The proposal is consistent with Scottish planning guidance
- The choice boils down to the government drive for greater offshore wind power vs. the negative visual and other impacts on Iona and other islands
- and that therefore the former must prevail

2/ For a proper legal analysis see the Iona or Western Isles documents but in terms of simple logic a response to these arguments is

- It is common ground that
    - The government - with widespread popular support including our own - is intent on increasing offshore wind power
    - There are economic benefits for Scotland from both the construction and O&M phases
    - Iona and other islands will suffer adverse visual and therefore material economic and employment impacts
- It is also true that many Scottish government policies and planning guidance notes attach limited weight to the visual impact of offshore wind farm projects but ultimately these are subordinate to the law - which does.
- The decision to proceed with this location may be the government's not the applicant's but it is still an irrational decision given the changed circumstances since the site was chosen in 2013
- The choice, however, should NOT be framed as
    - which is more important? the government's drive to increase offshore wind power <u>or</u> Iona's scenic, cultural and spiritual heritage and its significance for tourism?

  but instead as
    - Which is more important? delaying the project by two years by relocating it <u>or</u> Iona's scenic, cultural and spiritual heritage and its significance for tourism?
- The answers to both questions appear obvious.

- The first requires the subordination of Iona's interests.

- The second dictates the relocation of the project.

- We suggest the second framing is more appropriate.

3/ Put in even simpler terms, one should not see the issue as

NET ZERO OR SAVING IONA

but as

NET ZERO AND SAVING IONA

4/ On Iona specifically, the applicant is clearly nervous and has sought to minimise the significance of any impact on it by

- Understating in the EIA the impact, sensitivity and significance of the visual, heritage and tourism effects on Iona

- Seeking to focus the the SLVIA / visual impact discussion on areas designated as "National Scenic Areas" thus excluding the visual impact on Iona from consideration since it is "merely" a regionally designated "Area of Panoramic Quality".

- This was in contrast to the SNH's approach which saw the impact on Iona and the Paps of Jura as the two core sensitivities.

5/ Inevitably, the methodology of the EIA fails to capture fully the unique status of Iona. It is not just a piece of cultural heritage which happens to be one of the two most important tourist attractions drawing visitors to Mull. It is also a religious centre of great antiquity whose remoteness, serenity and scenery contribute to a spiritual atmosphere that is recognised internationally and is particularly appreciated by those into meditation or mysticism. This atmosphere would be severely damaged by the proposed project. This is already fuelling widespread outrage which will only grow.

6/ Even the Vikings - after the initial raids - came to see Iona as a very special place to be protected. Though it remained under Norse control until 1266, the Christian religious community soon reestablished itself and various Scottish Kings, Kings of the Isles and other Norse-Gael magnates are believed to have been buried there.

7/ It seems unlikely that Scottish Ministers will wish to be seen as less enlightened and less protective of a famous Scottish national asset than Ivar the Boneless or Olaf the White and may therefore wish to take a generous rather than narrow view of their responsibilities.

8/ No new objections arise from this section but some points support others made elsewhere.

10. RECOMMENDATIONS AND CONCLUSION

1/ We recommend that Scottish Ministers:

- **Refuse to grant deemed planning permission for the MachairWind project which we object to.**

- **Instruct the Marine Directorate to identify an alternative location for a large wind farm off the Argyll coast or elsewhere which is at least 50 km from the shore.**

- **Make available any such location in the next leasing round.**

2/ We appreciate that this will be a difficult decision for Scottish Ministers given:

- The inertia behind the project

- The momentum the government wishes to build for the 40 GW offshore by 2040 target

- The broadly based if sometimes indiscriminate enthusiasm for "Net Zero"

- £5bn projects tending to have a lot of supporters

- The power and influence of Iberdrola/ScottishPower in Edinburgh with their numerous lobbyists, allies and contacts

but at the end of the day

- What is being suggested is not the cancellation but the relocation of the project

- This may involve a two year delay but the 2 GW of offshore wind power will still come on stream before 2040

- The regional economic, employment and other benefits would also only be delayed but the adverse impact on Iona and the other islands avoided.

- The proposal is on thin ice legally and may be subject to judicial review

- Even if deemed planning permission is granted - and survives judicial review - there will be other fences to jump cf. the Scottish government granted planning permission for DRAX's Cruachan Pumped Hydro energy storage scheme only for it to run into difficulties arranging price support in Whitehall.

- The level of international outrage that may arise from this entirely unnecessary assault on Iona's fourteen hundred year old seclusion, serenity and spiritual atmosphere should not be underestimated.

3/ It would perhaps be better for the issue to be gripped decisively now and resolved at this stage rather than being allowed to grow into an ever greater problem.

Attachments

A. Increasing height of Wind Turbines and their visual impact 2000 - 26

B. Scottish Natural Heritage (now NatureScot) advice on W1 block in 2020

C. Alternative locations

D. Iona and Mull tourism and employment impact

E. Evolution of W1 / MachairWind location 2011 - 2

F. Background of objectors

ATTACHMENT A - THE INCREASED HEIGHT OF OFFSHORE WIND TURBINES AND THEIR VISUAL IMPACT 2000 - 25

Overall summary

- There has been a near tripling of the height of wind turbines since the area was selected.
- The clear air of the Inner Hebrides provides exceptional visibility.
- The EIA is unhelpfully vague about the factors affecting the distance at which wind turbines are visible
- The parent company Iberdrola, however, bases its conclusions on an 2011 American study reporting on wind turbines only 120m tall in regions where visibility was poorer than in the Hebrides.
- The SNH view that wind farms should be 50 km + offshore is - based on our analysis - reasonable

1/ There are three sections

- The increasing height of wind turbines
- The lack currently of a clear and coherent policy on visibility and visual impact
- Calculating the visual impact of 355 m tall wind turbines over various distances

2/ The overall aim to assess the reasonableness of two views

- Offshore wind turbines are only significant when less than 20 km ofv
- 335 m offshore wind turbines should be at least 50 km away from inhabitsted. Oats

Increasing height of Offshore Wind Turbines

<u>Key points</u>

- Doubling the height of a wind turbine leads to 4x the power
- This reduces costs and incentivises companies to build taller and taller wind turbines
- Since the original identification of the W1 Machair block in 2011 the typical wind turbine has grown from 120m to 335m i.e. by 180% or nearly tripling.
- Since the firm decision to proceed with the W1 block in 2020 the increase has been from 270m to 335m i.e. by 24%.
- There is no reason to think they will not grow still taller in future years.

Increased height

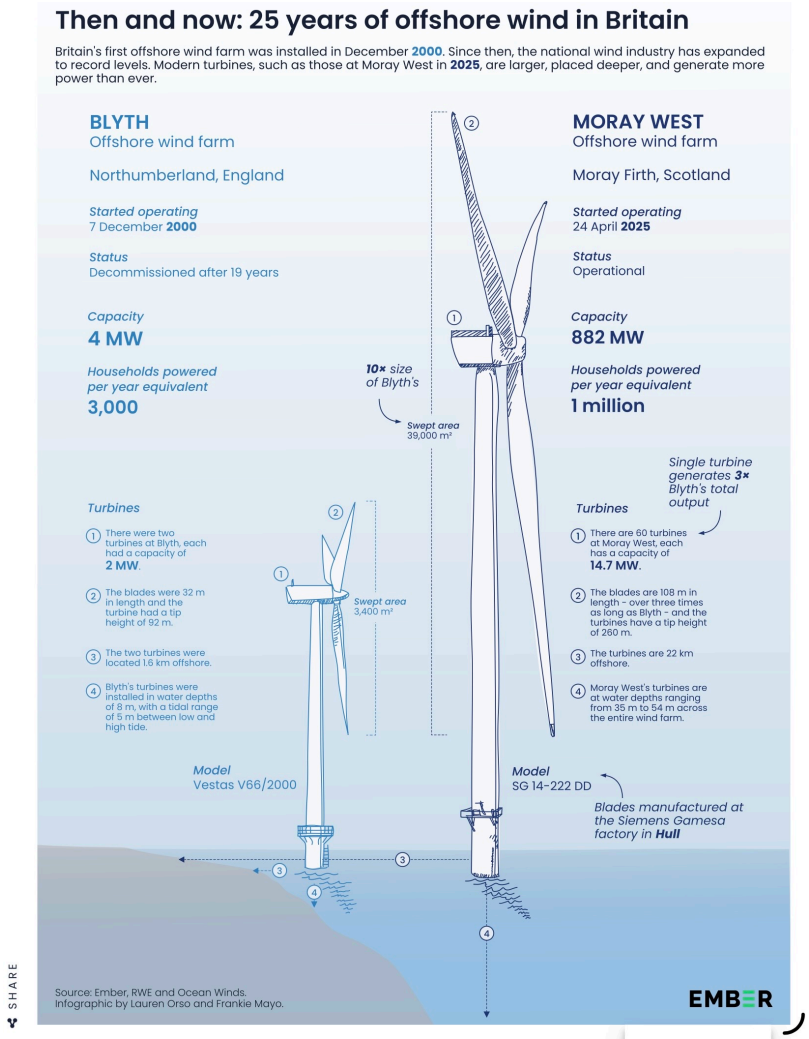
1/ The reasons that there is so much impetus behind increasing the height of wind turbines are

- Power increases with the square of the height i.e. 2x height = 4x power
- The winds are also stronger at 300m than at 100m meaning more power generated
- The effect has been to reduce costs from xx **to** xx

2/ There are some offsetting disadvantages (e.g. with the tallest wind turbines the blades can move so fast that when birds fly into them not only are the birds killed but the blades suffer cumulative damage) but these do not derail the basic logic.

3/ The result has been a steady then accelerating increase in the size of offshore wind turbines since they were first introduced into British waters twenty five years ago.

First and recent offshore wind turbines - 2000 and 2025



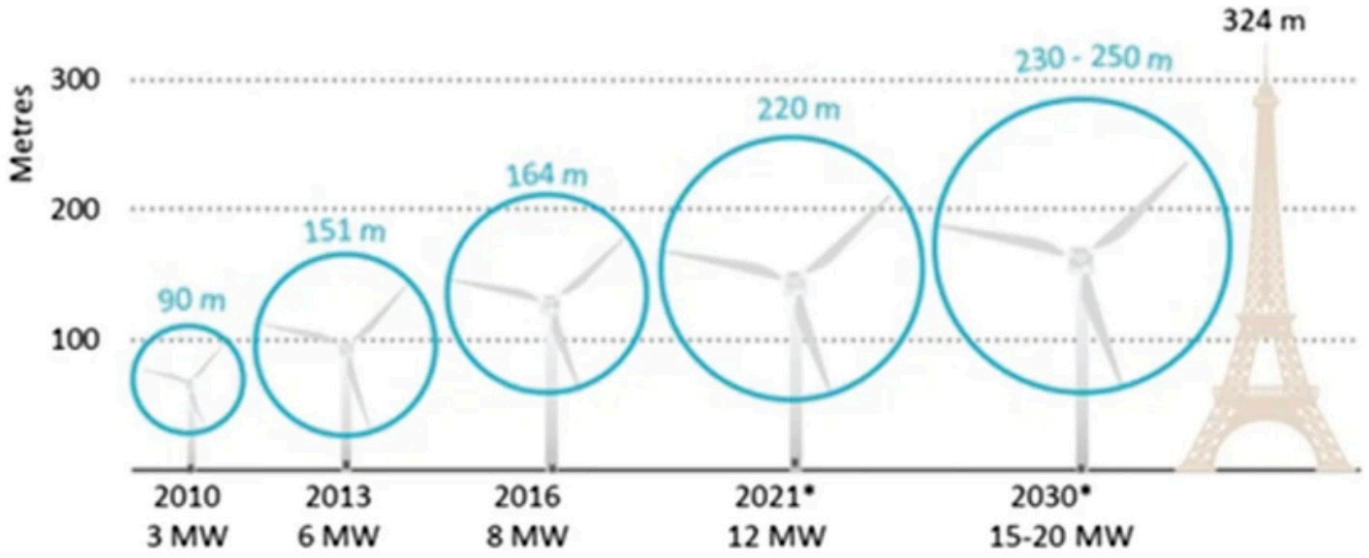
Source: Ember

4/ The basic comparison for an individual offshore wind turbine in 2000 and 2025 is

	Blyth (2000)	Moray West (2025)	Cost of Energy
Height	92m	260m	£150 / MWh
Power	2 MW	15 MW	£90 / MWh

5/ By 2020 - when the decision to select the W1 Machair block was confirmed - it was anticipated that wind turbines would be in the 250 - 270 m range by now.

Outlook in 2021 - after twenty years of increasing height



Global evolution of the largest commercially available wind turbines (.*expected) (IEA 2021)

Source: BNF / IEA

6/ Since 2020 there has, however, been an unanticipated growth spurt which means that in 2026 wind turbines of 335m are now planned for W1 Machair.

7/ This growth has an impact on the distance at which wind farms can be seen - which is discussed in the third section in greater detail. Pulling forward its conclusions the easiest way of summarising the situation is to compare the outlook in 2011 when W1 Machair was first identified, in 2020 when it was confirmed in its location - despite SNH's protests - and currently in 2026.

Date	Height m	Power MW	Distance visible km
2011	120	5	47 km
2020	270	15	64 km
2026	335	22	70 km

Lack of updated policy

Key points

- No clear up to date published policy seems to exist on assessing the distance at which offshore wind turbines are visible and how their visual impact should be assessed.

- There ought to be.

No up to date policy

1/ There seems to be no coherent up to date published official policy on the subject at present.

2/ The last guidance note appears to have been "Visual representation of wind farms guidance". SNH 2017 since when typical wind turbines have grown from about 230 m to 335 m tall.

3/ The current status of SNH guidance is unclear. Though their 2020 advice in response to the draft SMP-OWE is still a resource available on their website, Scottish Ministers rejected that advice for W1.

4/ The Marine Directorate adopts a case by case approach.

5/ Given the importance the Scottish government attaches to the rapid growth of offshore energy production this may seem a surprising omission.

6/ This lack of clarity may, of course, make it easier for the Marine Directorate to pursue its mission of driving towards 40 GW offshore power by 2040.

Process used in practice

7/ In practice, there is however a widely accepted procedure - even if not an accepted or even articulated up to date overall policy.

8/ SNH had originally developed the approach for onshore wind farms then repurposed it for offshore wind farms.

9/ It is a four stage process

a) ZTV (Zone of Theoretical Visibility)

The concerned parties agree the theoretical maximum distance and area which could see the proposed wind farm in terms of lines of sight if there was perfect visibility. This is the application of basic geometry and not a controversial calculation. It is even easier for offshore wind farms since the sea lacks the hills and buildings which complicate lines of sight for onshore projects. For W1 Machair, the applicant appears to have opened at 45 km but accepted 60 km without difficulty.

b) Selection of viewpoints

There is then discussion around choosing a selection of viewpoints from which to assess the visual impact. In this case, two viewpoints were chosen for Iona: the Dun, a 100 m hill, and the ferry to Mull at sea level.

c) Photomontages / wirelines

The EIA then includes photomontages from the chosen viewpoints. These are photographs taken from the selected viewpoints with e.g. the wind turbines digitally added. Thrte is a more skeletal diagrammatic version called wirelines.

d) Local planners / Marine Directorate / Ministers

The photomontages are then presented to the local council planning officers / committee - or in this case the Marine Directorate and Scottish Ministers - who can form their own judgement as to the significance and visual impact of the development.

10/ The applicant was not very clear in the EIA on its assessment of the visual impact but appears to think that this approach risks overstating the distance at which wind turbines can be seen in practice let alone act as a focus of "visual attention". Its parent Iberdrola takes a distinctly sceptical and alternative view (see below).

11/ This approach may not be a perfect fit with large offshore wind farms.

12/ Iberdrola has a point that over long distances atmospheric conditions can significantly reduce the distance at which objects can be seen. This is not incorporated in the current procedure.

Calculating the visual impact of 355 m tall wind turbines over various distances

Key points

- The SNH view that there should be 50 km + between wind farms and coasts is reasonable. If anything it understates the right distance,

- The Iberdrola view is incorrect in the Inner Hebrides because visibility is much better here than the Thames Valley etc from where they draw their statistics.

1/ The aim of this section to evaluate the reasonableness of the views of Iberdrola and SNH (now NatureScot) by seeking to use a methodical and transparent evaluation approach

X/ if you do not want to wade through what follows the conclusions are

- Iberdola's view that visibility is limited in practice to 20 - 40 km is wrong for the Inner Hebrides

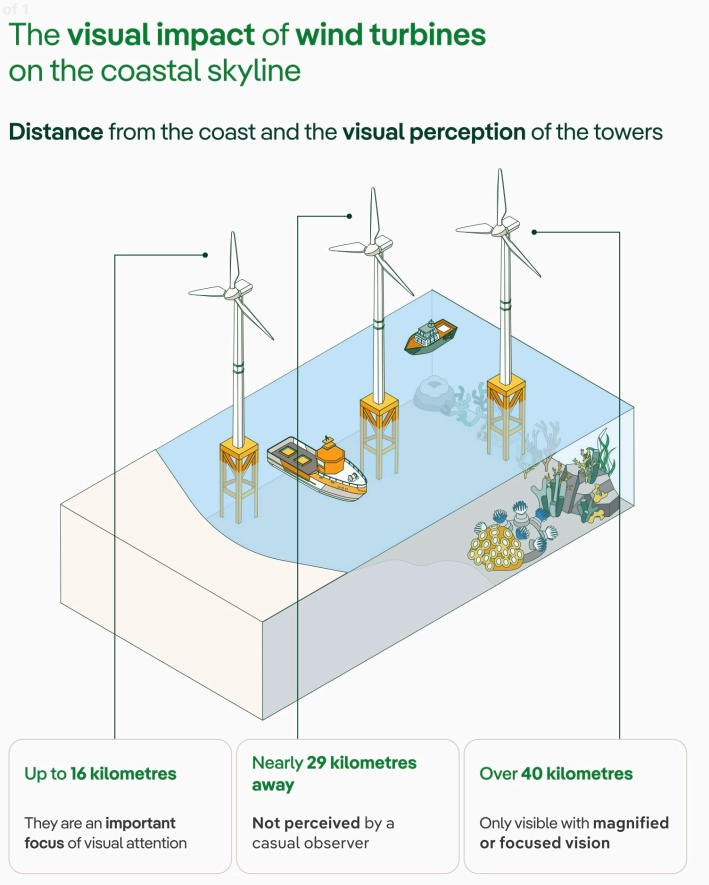
- SNH's approach which gives 50 km + as the appropriate distance necessary between coast and wind farm is reasonable and may be, if anything, too low.

<u>20 - 40 km view of Iberdrola / applicant</u>

1/ The applicant does not articulate a very clear view in the EIA on what it considers the limits of significant visual impact are in the Hebrides.

2/ Iberdrola - the parent company of the applicant - provides, however, a usefully categoric page on its website which we can use as a starting point.

<u>Iberdrola explanation of visual impact of wind farms</u>



3/ Iberdrola is suggesting that - though in theory one can see further - in practice

- one can perceive wind turbines up to 29 km away

- but they only become an “important focus of visual attention” i.e. an eyesore at distances of less than 19 km.

4/ If this was correct then Iona would have only a minor problem at 22 km - though Colonsay would be more affected at 12 km.

5/ Unfortunately, it is based on a 2012 American study[1] of various English offshore wind farms with three defects for our purposes. It was based on research

- the onshore wind turbines surveyed were typically only 120m not 335m tall

- focussed on the Thames Estuary, off Liverpool and the Wash which are well known for fogs, mists and poor visibility.

- the distinction between something being visible and being an eyesore was subjective and arbitrary

and as a result it is almost unhelpful for estimating the visibility of 335m wind turbines in the clean air prevalent in the Inner Hebrides.

6/ It is not known who financed the Argonne study or who chose the Thames Estuary and other locales for the study.

7/ It seems probable that the Marine Directorate relies in the same study since they use implicitly a 30 km visual impact to set minimum distance for offshore wind farms off the East Coast - though obviously have used a different and lower figure for the West Coast.

---

[1] Iberdrola does not state which study they are using as a source for their 2026 webpage but I assume they are referring to “Wind Turbine Visibility and Visual Impact Threshold Distances” by Sullivan et al Environmental Practice 2012. The study was conducted in 2011 by a landscape architect, archaeologist and a xx over ten days**.**

Argonne National Laboratory is associated with the University of Chicago. It was responsible for other similar studies around the same time such as “Wind Turbine Visibility and Visual Impact Threshold Distances in Western Landscapes” by Sullivan et al Argonne National Laboratory 2011, which came to similar conclusions when looking at Wind Farms in the Mid West i.e. 32 km as a distance at which a wind farm would be unlikely to be missed but that only at 19 km would it become a major focus of attention i.e. an eyesore..

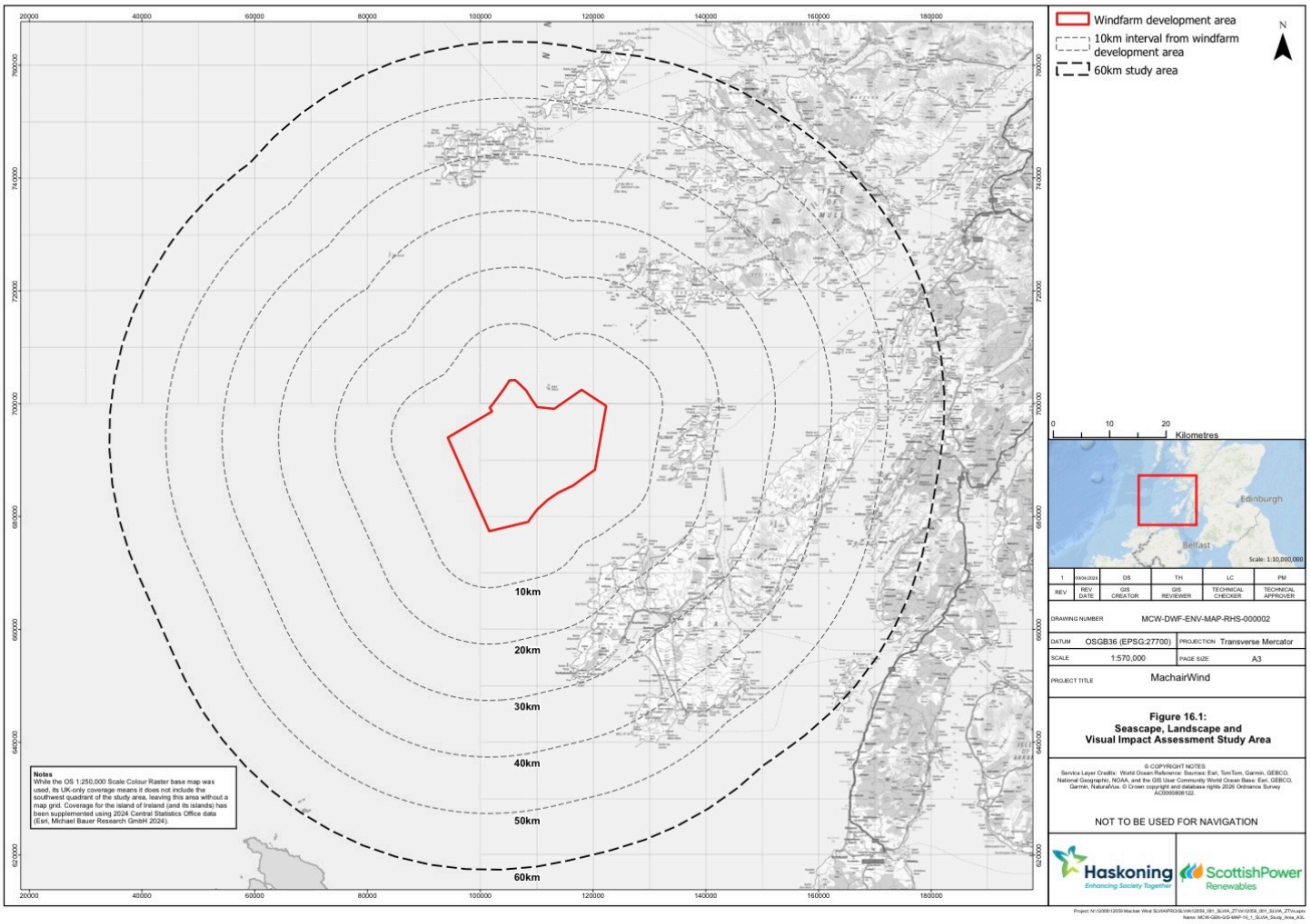
8/ The applicant's views are summarised in the footnote 2 below. [2]

[APOLOGIES I DO NOT HAVE TIME TO FINISH THIS SECTION BUT THE DRFIFT OF THE LOGIC IS CLEAR. THERE SHOULD BE 50 KM + BETWEEN IONA AND THE WIND FARM]

<u>50 km + view of SNH</u>

1/ The applicant xx xx xx

<u>The visual impact zone of 335m tall wind turbines</u>



[2] The ight (SN 0 m to bl very appr t be dete Tide (LAT

How rs in recognition of the increasing heights of WTGs. For example, 60 km was agreed for Berwick Bank Offshore Wind Farm, where 355 m turbines are proposed (Marine Scotland, 2021),and for Caledonia Offshore Wind Farm, which is proposing a maximum 350 m blade tip height(Marine Scotland, 2023a).

A Zone of Theoretical Visibility (ZTV) map was generated. This indicates the potential visibility of WTGs of 335 m tip height within the WDA. The ZTV is based on bare earth terrain modelling and <u>takes no account of distance or atmospheric visibility. It therefore overestimates visibility and cannot be used as an indicator of LSE [Large scale effect]</u>. The ZTV was used as a tool to inform the identification of receptors to be considered in the assessment. Receptors which are outside the ZTV would not have visibility of the Project and are not considered further in this SLVIA."

What are we trying to work out?

1/ The reasonableness of the two views.

The key question is can a normal observer see on a clear summer day the object under consideration i.e. specifically a 335 m wind turbine farm over various distances.

3/ The weather in Argyll is notoriously awful in the winter. Even in summer, tourists realise that weather is very changeable.

X/ The pay off is the days of superb visibility and clarity which profpduce outstanding views.

X/ As a result we are not interested in annual averages but visibility on clear days.

X/ The observer is assumed to be a 1.7m (5 ft 4 inch) tall individual without binoculars or other aides. Initially the observer will be at sea level but later we will move them up and down a few hills to see what happens.

Frequency of clear days

X/ The first task is to confirm that there are enough clear summer days for this approach to make sense.

X/ We are fortunate that there is a weather station on Tiree which is only 29 km from Iona. **Xx** 1957 - 97

X/ Tiree experiences 1524 hours of sunshine each year on average which is roughly the equivalent of 63 days though, as anyone who know the changeable weather in Argyll or the Inner Hebrides can bear witness, much of this will arrive in shorter part days.

This indicates that in the summer approx. 20-25% of the time visibility is very good. This is when see the outstanding panoramas and vistas that make the place so inspiring.

The tourist industry in the Inner Hebrides is based on this fact. Otherwise the rain and midges would make it difficult to get anyone to visit us.

Breaking down the issue in hope of an objective approach

X/ I have chopped the problem up into five discrete steps in the hope of getting a transparent and objective answer. This is not intended to be a definitive calculation but merely a tool to assess the reasonableness of the two views. The five steps are:

a) Theoretical distance given curvature of earth / line of sight

This is totally uncontroversial. It is a matter of geometry. Same as ZTV calculation. The only tweak is that one has to add 8% because light bends slightly in the atmosphere which is why you can see slightly beyond the theoretical horizon. Again uncontroversial.

b) Practical distance given haze, weather, pollution, etc

Clearly, the theoretical distance is irrelevant if the observer is in a dense fog. Even on sunny days there may be a haze.

Using the Tiree data we know that on clear sunny days the visibility was 50 - 80 km. We will use 70 km. Others might argue for 60 km. It does not affect the argument much.

	Visibility from Tiree
Best days (10th percentile)	70 - 80 km
Median (50th percentile)	35 - 40 km
Worst days (90th percentile)	10 - 15 km
Mean average	40 - 50 km
Frequency of good days > 20 km	70 - 90 %

This is the one of the key differences with the Argonne study. The foggy Thames estuary probably produces genuinely much lower numbers.

c) Perceived size of objects at distance

The Moon and a football at 25 m look the same size because they have the same angular dimension of about 31 arc minutes (arc mins) which is 31/60 of a degree.

The smallest object the eye can see is 1 arc min across (i.e. 1/60 of a degree). 5 or 10 arc min arc mins objects can be seen easily but whether one notices them is down to salience and the eyesore threshold

An object like the Moon at 31 arc mins can loom large.

At 50 km, a 355 m wind turbine would be about 30 arc mins if one could see all of it BUT because of the curvature of the earth one only sees the top third it is 10 arc mins across. That is still clearly visible. Think of a mini-moon with the third the width of the actual Moon.

The distance a wind turbine shrinks to 5 arc mins is xx

The distance a wind turbine shrinks to 1 arc mins, which is the absolute minimum for the human eye, is theoretically xx km which is xx

d) Salience of objects

Whether one notices an object is another matter.

If an object is camouflaged it will have low salience. The Moon glowing in the night sky or red lights flashing have extremely high salience.

Traditionally, visibility was judged by dark objects against a light background e.g.. a plane against the sky.

Wind turbines are intended to have high salience to stop aircraft flying into them. They are painted white and, at night, have red flashing lights.The bottom line is that

In daytime, the turbine would shrink to 5 arc mins at a distance of xx km. I would regard 5 arc mins as the limit for seeing the turbines.

In the night, however, because of the extremely high salience of flashing red lights I would see 1 arc min as the minimum if arranged in a group.

e) Eyesore threshold a.k.a. maximum distance for "an important focus of visual attention"

This final step is the most tricky. We all know individuals who are oblivious to their surroundings and others who can spot dust at 10 m.

There is much to be said for the pragmatic approach of dumping photomontages in front of whoever is deciding on planning applications and leaving it to them … but to continue with our search for an objective answer:

I think for the average normal individual the keys are movement / alteration and grouping

a) movement / alteration e.g. flashing. The human eye picks up movement even when objects appear small.

b) grouping of objects. The human eye is also very sensitive to patterns including grouping. It might not notice one 10 arc min wind turbine but would spot ten in a row. Let alone ninety one.

Since the turbines rotate and the red lights flash, I think we should treat the results obtained prior to this stage as the actual results i.e. wind turbines are designed to draw attention to themselves with their brilliant white paint and red flashing lights to stop people flying into them. It works.

I do not accept the Argonne study view that xx

More concretely, I think the idea that ninety odd white wind turbines spinning away 22 km from Iona is non intrusive and would not be eyesores / objects xx is ludicrous..

Conclusions

X/ If one combines these various factors it becomes clear that - although up to now the taller the wind turbine the further away it can be seen - we have now reached the point where the principle determinant of how far we can see is atmospheric conditions.

X/ The last three steps have relatively little effect in practice on the result. Wind turbines are designed to be highly visible to discourage planes from flying into them.

Summary tables

X/ Xx

Table 1 - xx

Date	Height of WT	Theoretical limit	After haze etc on clear days	Combined (A)

2011	120	47 km	60 km	47 km
2020	270	64 km	60 km	64 km
2026	335	74 km	60 km	70 km

X/ xx sea level xx WT = 335 m

	Height of observer			
Dun of Iona	xx m	116 km	70 km	70 km
Paps of Jura	xx m	132 km	70 km	70 km
Ben More	xx m			

X/ We then consider the impact of the next two steps giving us Combination (B)

Table 2 - xx

Health warnings

1/ This exercise was designed to test the reasonableness of the two views and is not definitive

2/ There are assorted issues

- The Tiree data becomes “unrealistic” after 2000 after human observers were replaced by an automated device
- Reduced pollution is improving visibility globally
- climate change is having complicated impacts

Need for more research

3/ This issue is susceptible to a more informed analysis. More research should be done to produce conclusive answers.

4/ The Met Office and Tiree has a lot of data I have not accessed.

Need for a clear policy

5/ This research could then inform a clear evidence based policy.

ATTACHMENT B - FORMAL ADVICE FROM SNH IN 2020

Summary

• SNH sought to impose some sanity on proceedings in 2020

• Its recommendations were ignored or dismissed.

1/ SNH was not happy with the Marine Directorate's 2020 proposals for W1.

Scottish Natural Heritage's framework

Table 2 Design Approach Framework

Coastal Sensitivity and Design Approach adopted (susceptibility and value)	Opportunities for development without significant landscape or visual effect (magnitude of change)
General coastal landscapes	
NO SIGNIFICANT EFFECTS PREDICTED	**Substantial opportunity for development across the entire site**
Regionally important landscapes and seascapes; distinctive coastal character; **REDUCE - Significant effects**	**Considerable opportunity across much of the site, with SNH's strategic design recommendations**
• ***35+km*** *to REDUCE significant effects of 200m turbines* • ***40+km*** *to REDUCE significant effects of 250m turbines* • ***45+km*** *to REDUCE significant effects of 300m turbines*	**Some opportunity within the site and guidance on height, distance and horizontal extent**
Nationally important and distinctive landscape and seascapes; wildness and frontier qualities; **AVOID - Significant effects**	**Limited opportunity for development with guidance on height, distance and horizontal extent**
• ***40+km*** *to AVOID significant effects of 200m turbines* • ***45+km to*** *AVOID significant effects of 250m turbines* • ***50+km*** *to AVOID significant effects of 300m turbines*	**Very limited opportunities for development without significant landscape / visual impacts**

2/ SNH outlined their preferred approach in their response to consultation on the draft SMP as above. It included

- Seeking to avoid or reduce significant impact on both types of designated areas of natural beauty: APQs and NSAs - though accepting NSAs deserved more.

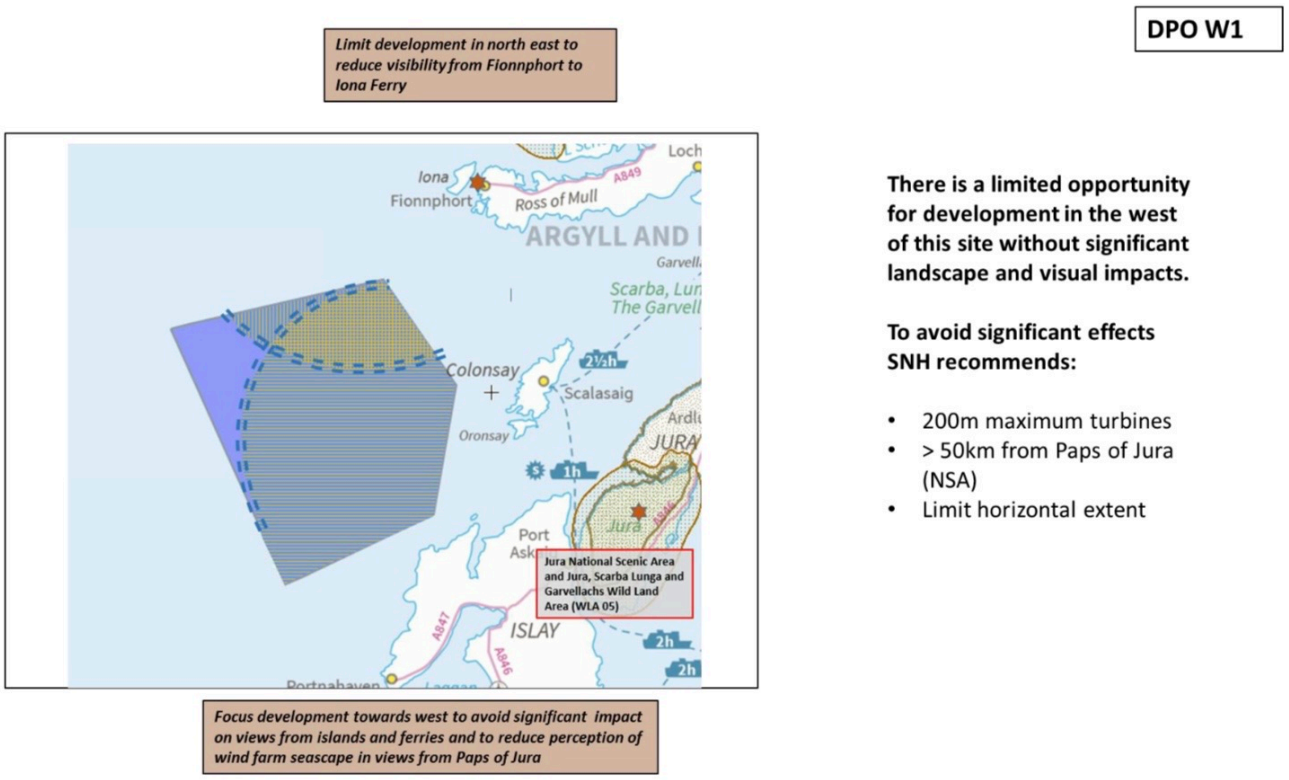
- Setting acceptable limits on the distance between turbines and Iona and other sites in APQs depending on the height of the turbine

Height of turbine	Recommended distance
200 m	35 km
250 m	40 km
300 m	45 km

- Setting equivalent limits but 5 km higher for NSAs

- For a 335 m turbine, the same approach would give a figure near 50 km

SNH recommendations for W1



3/ The practical impact on W1 of this approach on protecting Iona and the Paps of Jura was

- SNH proposed a cap of 200 m on turbine height

- Even so recommended that they should be banned from 80% of W1

W1 Large pentangular shaped site located immediately off the southern Hebridean coastal islands of Colonsay (nearest 9km, furthest 49km) and Islay (nearest 3.5km, furthest 47km) and 16 km from south Iona to the northeast.	**SENSITIVITY** Complexity Highly complex and varied coastline stemming from the overriding southwest to northeast 'grain' of the interlocking land and sea. The Great Glen Fault line is represented by the long narrowing finger of water running from the Firth of Lorn north-eastwards into Loch Linne. The orientation of this is reinforced by the linear upland massif of Jura and the pronounced and recognisable profile of the Paps of Jura. To the north and south of this overriding feature are the islands of Mull and Islay – the upland massif which characterises their eastern and central areas slopes down markedly to a lower lying western coastal fringe. The ever changing interplay and balance between land and water and the character and elevations of landforms create a highly intended coastal edge. Scale Corresponding to the complexity of coastal character there is a high variation of scale, from	• Nationally protected scenic landscape • Distinctive regional coastal landscape comprising varied complex coastal character of small to medium scale – interplay between islands and water • Coastal focus of historically, culturally important settlements and communities, with substantial recreational and tourism interests • Range of viewing elevations from Paps of Jura to sea level coastal communities • Strong frontier character reinforced by tangible wildness qualities of remoteness seclusion,	**We advise that there is a limited opportunity to develop the western part of site without significant adverse landscape and visual effects:** **SNH Recommendations:** • maximum turbine height of 200m. As part of design iteration, turbines lower than 200m should be explored to further mitigate significant effects. • limit development to beyond 50km (mitigating significant effects from elevated viewpoint of Paps of Jura NSA and WLA)
	the larger scale of landscape experienced on the western lower lying coastal fringes of the offshore islands, to the lower medium scale experienced moving eastwards where the increasing dominance of more elevated landform encloses and frames views to the coast. Nationally designated landscape with coastal special qualities: • Jura NSA • Loch an Kael, Isle of Mull NSA (• Scarab, Lunge and The Garvellachs NSA • Knapdale NSA Nationally protected landscape with coastal attributes and qualities: • Jura, Scarba, Lunga and The Garvellachs WLA 5 • Ben More WLA 8 (surrounding) Distinctive 'regional' landscape Argyll and Bute Council has identified Areas of Panoramic Quality (LDP SG 2016) which are areas of regional importance in terms of their landscape quality, and defined Isolated Coasts on Mull and on Jura and Islay, both of which convey the sensitive coastal qualities. . The complex character and variety of scales of landscape, combined with the wide interplay and experiences of water enclosed by upland massive contribute to distinctive regional character. Individually and cumulatively, the variation in size and character of the islands have distinctive scenic and cultural qualities, such as Iona, Colonsay and Oronsay. Strong qualities of wildness, seclusion and remoteness, in particular apparent on the outer islands are reinforced by the mode of ferry transport. Focus of human activity Towns and small scale settlements form the focus of populations along the narrow seaboards, many of which area intimate and small scale, with inherent scenic qualities focussed on a harbour and thereby having a strong relationship with the sea. Significant recreational and tourist interests. Frontier coastlines Strong frontier qualities in particular from the outer islands which, by their very nature as islands off the western extremities of the mainland, increases their qualities of remoteness. The greater dominance of water with open expansive views considerably enhances these frontier qualities. **MAGNITUDE OF CHANGE** Distance Larger pentangular DPO site with sides of the site running parallel to and in close proximity to shorelines of Islay, Colonsay and Mull, with the potential to increase the horizontal field of view of development At distances ranging from 3.5km to 16km there is the potential for this DPO to introduce significant adverse landscape and visual effects from all turbines scenarios onto a range of coastal receptors. Potential for impacts from maritime and aviation lighting. Cumulative wind energy No notable commercial marine or terrestrial wind energy development.	isolation, naturalness • Larger scale of DPO site and inshore spatial relationship to nearest coastlines • Very close proximity of DPO site to coastlines with the potential for extensive significant effects • Potential to introduce significant effects from both marine and aviation navigation lighting • Onshore cable landing and grid connection could potentially impact on scenic and wild coastal character. **Design approach advised – Avoid significant effects**	• limit development to beyond 35km from Colonsay and Islay • limit development to beyond 35km from all surrounding coastal edges to reduce effects on distinctive coast character, strong frontier qualities and culturally important features such as Iona. • limiting the extent of development within the DPO site reduces the dominating horizontal extent and field of view of turbines, mitigating significant effects in views from the lower lying coastal fringes and from the Paps of Jura. • at the project level, we encourage a single developer to take forward a design led approach to further mitigate effects.

4/ SNH also provided a fuller rationale as above.

5/ SNH's views were not welcome and were ignored or dismissed.

6/ We are unaware of any published rationale for this rejection of the views of SNH - which was the official body responsible for advising the government on these issues.

.Modification to W1 boundaries in 2022



7/ There were a few comments in the “Sectoral marine plan for offshore wind energy” (SMP-OWE) and its associated “Islands communities impact assessment” but - as discussed above - these failed to engage with SNH’s arguments.

8/ it was claimed that these “mitigating” changes reduced the area of W1 by 38% - which looks high - but the benefits for Iona were minimal.

Recent developments

9/ See chapter 1 on the applicant’s attempts to nobble SNH (now NatureScot) in terms of this application.

ATTACHMENT C - ALTERNATIVE LOCATIONS

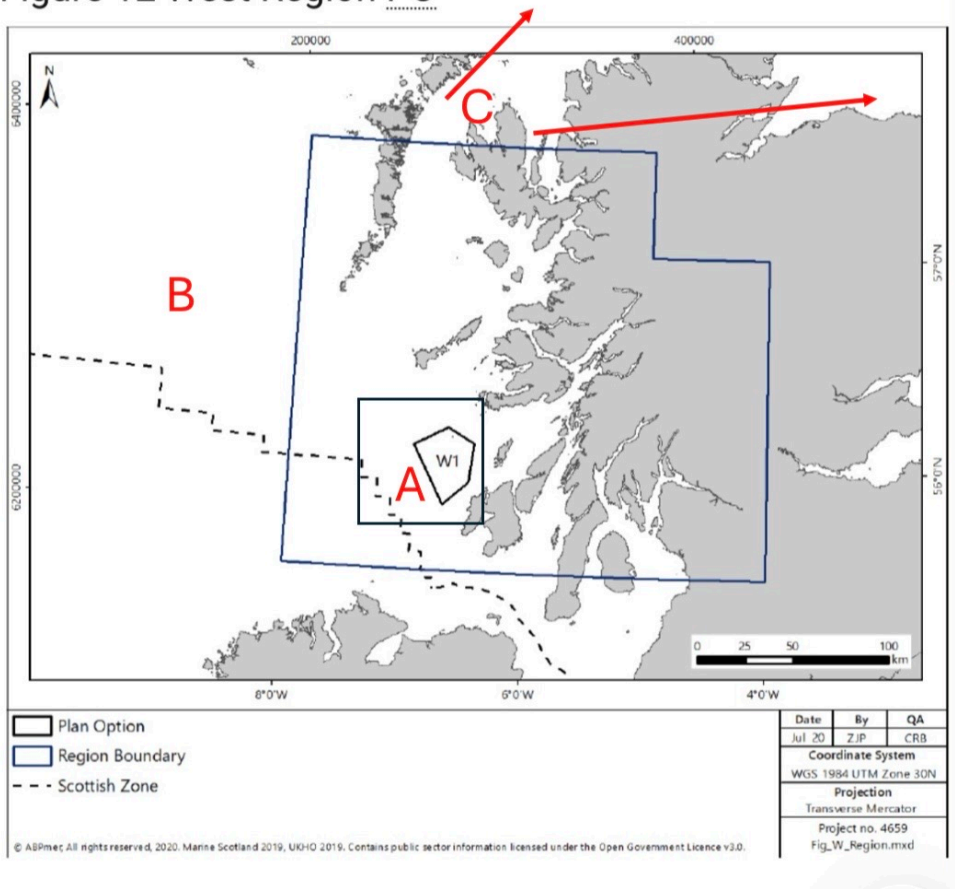
Summary

- There are genuine alternatives
- Each has its own risk and financial profile

1/ It would not be surprising if Iberdrola / ScottishPower have an “oven ready” contingency plan in case they fail to get planning permission. If so, they will have had four years to do a far more detailed evaluation of alternative locations than is attempted here.

Alternative locations

Figure 12 West Region PO



2/ There are three obvious options

A - Shunt south West

B - Move West

C - Exit West Region Temporarily

All three would ensure that the project was at least 50 km away from inhabited islands.

Option A - Shunt south West

1/ Option A would move the project approximately 30 km south west

X/ The new block would be broadly a lopsided triangle with its south western border running parallel to the UK/Irish marine border, its western border on the 60 m depth line and its northern and eastern borders defined by keeping a 50 km distant from all inhabited islands. There would be a small overlap with the existing block.

2/ The main advantages are

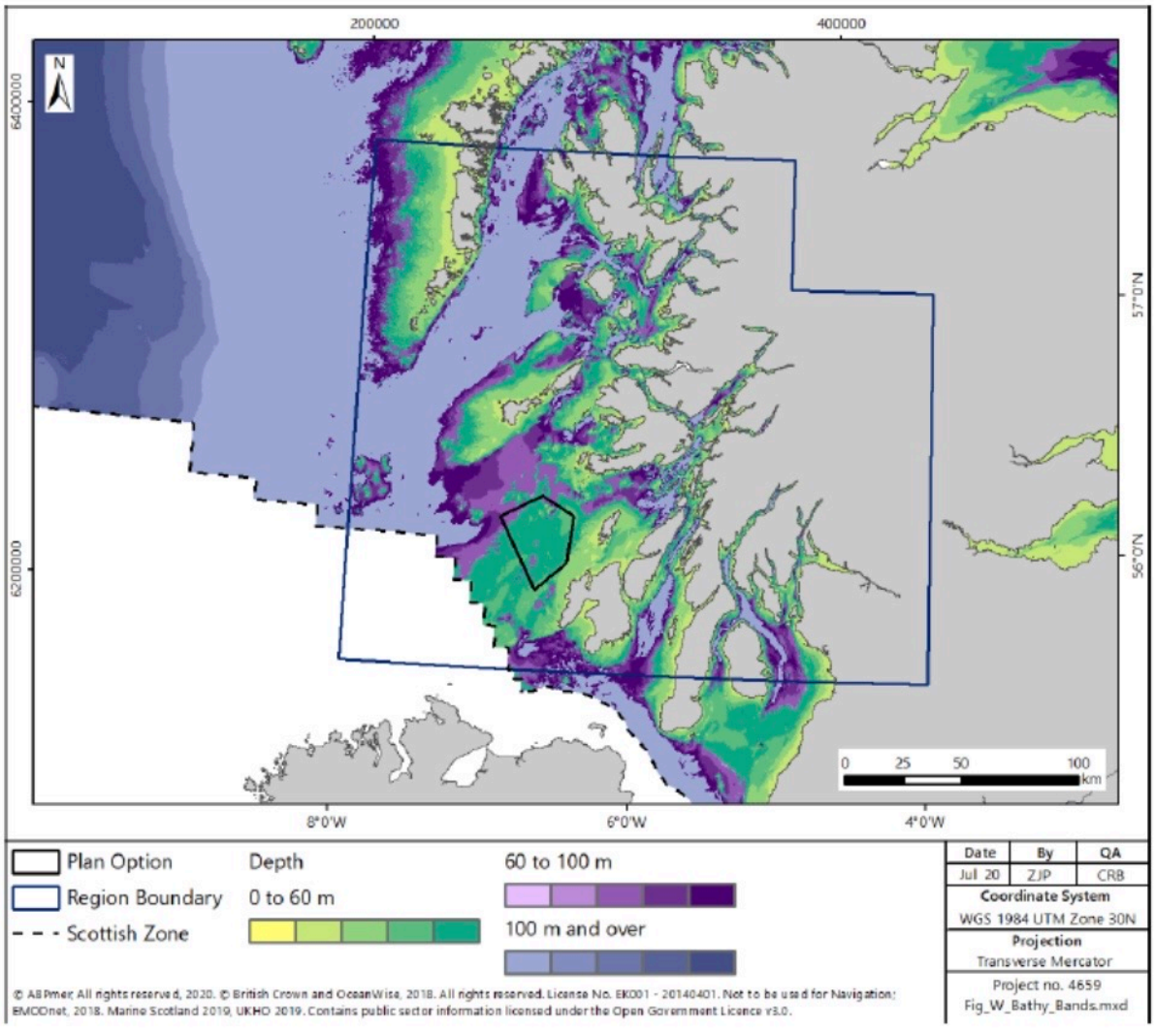
- the depth and sea bed are similar to those in the existing block simplifying the change. (See map below with depths. Fixed wind turbines are restricted to the green areas with depths of less than 60m.)

- it permits the continued use of fixed rather than the more expensive floating wind turbines

- costs and logistics would be similar to the existing scheme

Depth determines use of fixed or floating wind turbines

Figure 57: West region: banded water depth



3/ The main disadvantages of option A are that

- it places the project in the middle of an existing shipping route which would have to be rerouted and/or subjected to a strict traffic management system similar to that operated in the North Channel between Kintyre and Antrim.

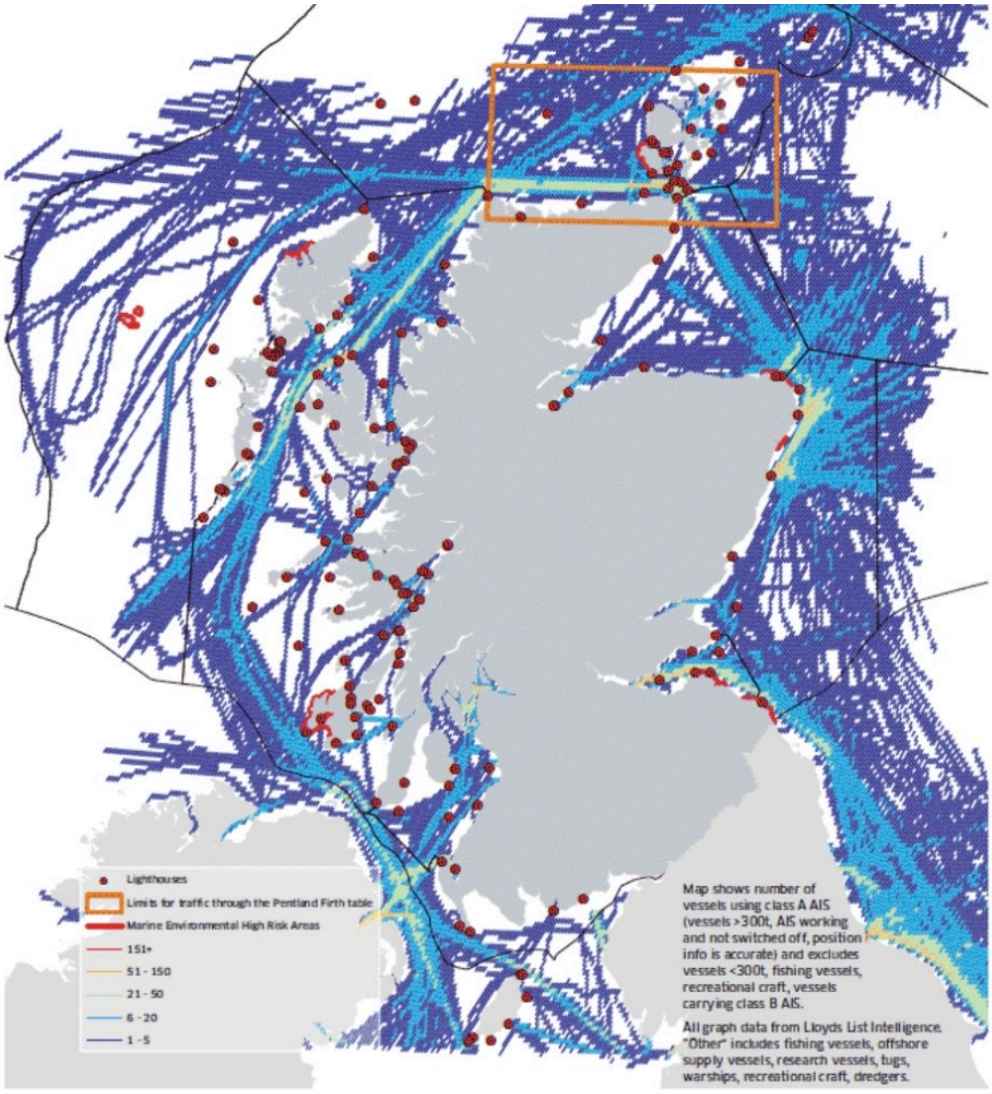
- MOD would be opposed since it might impede submarines

4/ In normal circumstances it would be unthinkable to impede surface vessels but given the priority attached to increasing offshore wind it might be considered.

- Arguably, if one is prepared to trash a fourteen year old religious site of great historical and cultural significance then one might consider asking a limited number of ships to reroute twenty miles south

- The worst case would be implementing a system **xx** North Channel

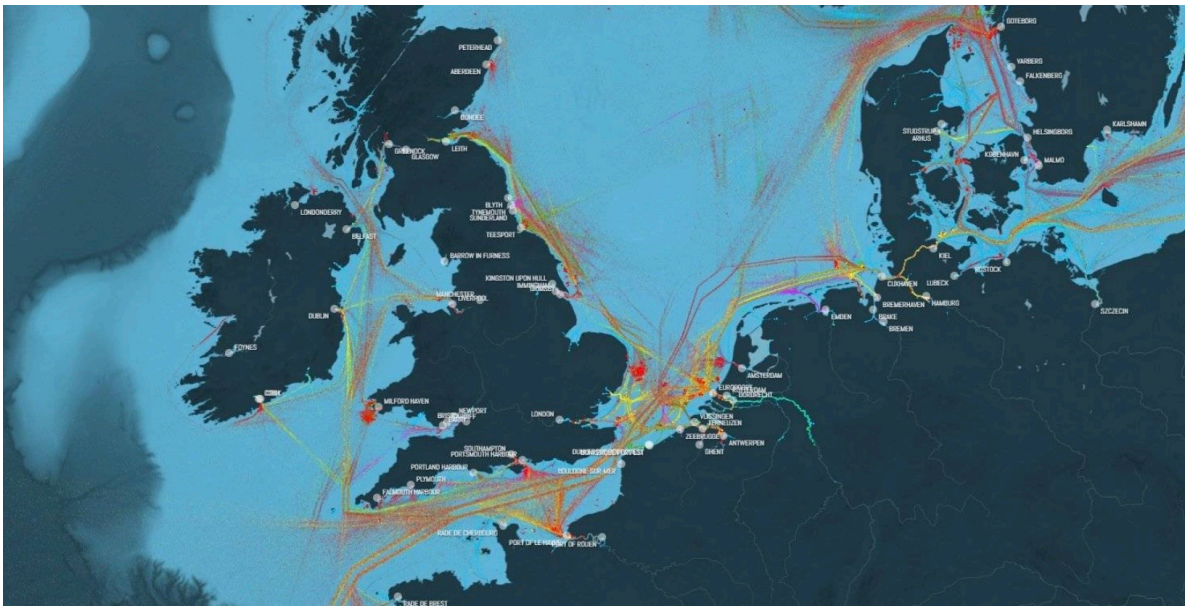
Shipping routes around Scotland



Source: xx

- One should also retain a sense of perspective. We are not talking of the English Channel. In reality shipping volumes in the affected area are relatively low.

Shipping volumes around UK and the North Sea



Source: shipmap.org

X/ The MOD would protest.

- Submarines exiting from the Clyde tend to submerge off Arran then proceed through the North Channel between Kintyre and Antrim then south of Islay still submerged before heading westwards towards the edge of the Continental Shelf.

- They would not welcome the sudden appearance of ninety one wind turbines - especially the boats of the Astute class which tow arrays which may run a km behind the vessel and could get entangled around the turbine bases.

- It is possible, however, that an accommodation could be reached given the improved relationship between the RN and Irish Navy which might allow them to reroute boats either along the maritime border or via Irish waters. The larger Vanguard class may use a route close to the border currently.

4/ In summary, the project would face few increases in costs and is otherwise financially attractive if the difficulties can be overcome. The latter may, however, be extremely difficult and would involve some challenging negotiations.

Option B - Move West

1/ This would would involve moving the project at least 120 km west.

2/ Since there is a shipping route running north-south to the west of the existing W1 bloc one would presumably need to hop over that and relocate south west of Barra or even further west. See shipping map above.

3/ The main advantages are

- No problem with visual or other impacts on inhabited islands. It would be out in open ocean.
- No problem with shipping or the MOD
- The winds are stronger than in the current location leading to higher electricity production

4/ The main disadvantages are

- Depths of 100-200 m which would require a shift from fixed to floating wind turbines (see below)
- Remoteness would push up construction, connection and operational costs
- If the electricity was landed in the Outer Hebrides it might require investment in the transmission grid but this may be happening anyway because of the areas being developed north of Lewis.
- Hostile operating conditions in the Atlantic
- Perceived risks: it would be truly pioneering and involve simultaneously opening up a new offshore wind province while using new technology. Either may be acceptable in isolation but the combination may be disconcerting.

5/ Floating Offshore Wind Power is now a well established and mature technology.

6/ It is being fostered and subsidised by DESNZ in London which is prioritising its development.

7/ In the last CFD auction, DESNZ / OFGEM were willing to pay £216 / MWh for floating offshore wind power against £89 / MWh for fixed.

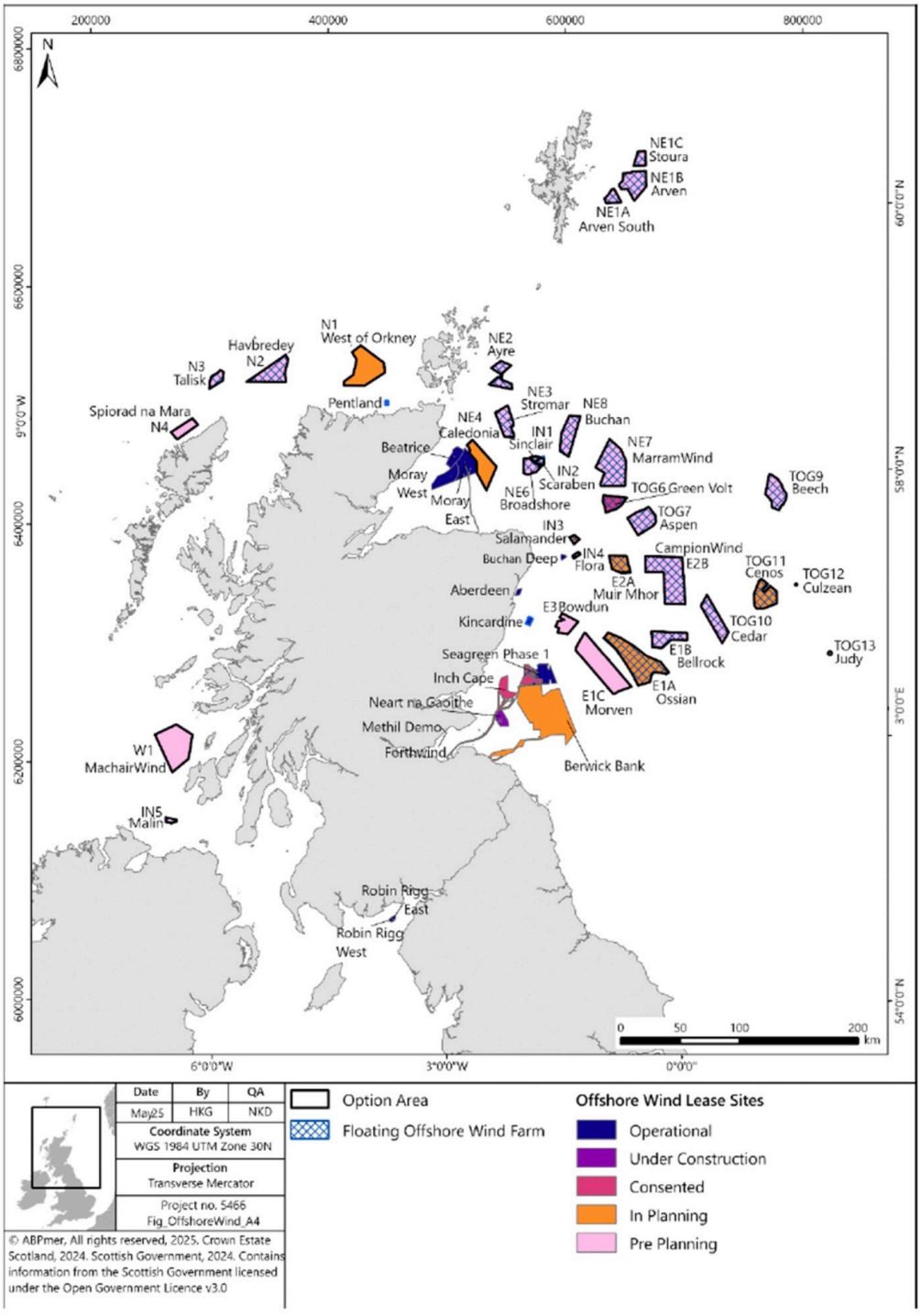
8/ Scotland is also prioritising floating offshore wind power. 11 ex 20 of the 2022 ScotWind round blocks were for floating offshore wind farms

9/ As a result, the sector is commercially attractive to companies. Iberdrola / ScottishPower paid much the same for a floating block in the North Sea as it did for the fixed W1 Machair block.

10/ A new offshore wind province in the Scottish sector of the North Sea is being established. established

11/ Another is emerging north of Sutherland and Lewis. with the N2 and N3 blocks and the government is hoping to establish a third off Shetland. Option B would represent the beginning of a third.

The new province - floating wind farms in deep waters in the North Sea



Source: Crown Estate

Note: the hatched areas use floating offshore wind turbines.

Option C - Exit West Region temporarily

1/ This would involve relocating out of the Western Region to an area either in the North Sea or off the north of Scotland - before returning to the West region later.

2/ The main advantages are

- there are some blocks from the ScotWind round which are still unclaimed in whole or part. These could be processed administratively relatively easily and rapidly.

- Alternatively, another block could be defined by the Marine Directorate. There is a lot of unclaimed space in the North Sea and even more north of Sutherland.

- Iberdrola already has operations in the North Sea both off East Anglia and Aberdeenshire (see below).

- The North Sea is a well supported region unlike the West Coast with established supply chains and sub contractors

3/ The main disadvantages are

- It would, as with option B, probably require a switch from fixed to floating wind turbines.

- It would be seen as abandoning the West Region.

4/ Iberdrola already has large projects in both the English and Scottish sectors of the North Sea including East Anglia One, Two, Three and Four in English waters and NE7 MarramWind and E28 CampionWind in Scottish.

5/ There is no major difficulty in pursuing Option C but it would involve leaving the West Region at least temporarily.

A new strategy for the West Region?

1/ Irrespective of which option is chosen there ought to be an ambitious strategy for the West Region.

2/ It is not known whether the Marine Directorate has at present a formal strategy for the West Region or merely a determination to implement W1 given it has been part of the plan since 2013.

3/ If one sought to establish a new forward looking strategy for the West Region at this point it might centre on

- multiple floating offshore wind farms positioned more than 50 km offshore

- located west and south west of Barra and South Uist i.e. Option B

- a supply chain built up on the Clyde with forward bases in e.g. Campbelltown and Oban

4/ It would be essential for there to be a regional offshore development office on the West coast probably in Oban. (The Marine Directorate already has an office in Oban but it is concerned with fishing compliance.)

5/ There is no intrinsic reason why a new province could not be developed but there is a “chicken and egg” problem. Unless the government is committed to supporting a large multiple wind farm province, it will be hard to build up the supply chain and support infrastructure needed.

6/ Much will depend on the cost picture and level of the offshore energy industry’s appetite for these projects. Th “ big picture” is that the industry has recovered from the crisis of 2021-24 and is reacquiring its taste for ambition and risk

7/ The longer term picture is that costs for offshore wind turbines are expected to decline materially by the mid 2030s.

ATTACHMENT D - TOURISM AND EMPLOYMENT ON IONA AND MULL

Summary

- Iona is one of the main tourist attractions on Mull

- Possibly 90 jobs would be lost on Mull if Iona became a significantly less attractive tourist site.

Note: The stats on this topic are limited. The main hard data are the CalMac passenger numbers and the visitor numbers for some but not all of the tourist sites.

Blue Seas, Green Energy projections (2011)

1/ Back in 2011, an official analysis suggested that by far the largest negative financial effect of offshore wind farms off Argyll would be on tourism and not the impact on fishing, shipping or other areas. They estimated a negative impact of up to £3.4 m per annum.

2/ These estimates were for the entire West Region and a wider range of projects but nevertheless encourage a sceptical view of the the EIA's suggestion the impact on tourism and Mull will be negligible.

3/ For some reason or other, officials and the EIA later concluded the impact on tourism was not significant. The OB and BiGGAR Economics went the same way. Curious.

Tourism on Mull

4/ In the 1960s Mull was very isolated and impoverished. The population had fallen to 2,000 and there was little work other than farming, fishing and public sector roles.

5/ Then a roll-on roll-off ferry service was introduced in 1973 between Oban and Craignure and the number of visitors and inhabitants began to increase.

6/ There are now around 350,000 visitors each year (including the Fishnish ferry route), the permanent population has risen to 3,000 and around 600 are estimated to be directly employed in the tourism sector. [3]

7/ The visitors can be divided into four groups with rough estimates of the number of visits from each category

- Self catering cottages 50,000
- Hotels and B&B 60,000
- Cruise liners 15,000
- Day trippers / campers 225,000

[3] There are higher figures in circulation of up to 700,000 visitors but these appear inconsistent with the CalMac passenger numbers. The EIA estimate is lower but may contain an arithmetical error.

8/ Clearly not all visits are equally valuable. Self catering cottagers may average a week on Mull while day trippers spend only one. Cruise ship tourists may spend more than campers. This is not, however, the data to push further into this area.

Main attractions

9/ There are four main attractions on Mull [4]

- Iona 111,000 visitors
- Staffa 110,000
- Tobermory 75,000 est
- Duart Castle 35,000 est

10/ This compares to other major Argyll attractions such as

- Oban distillery 157,000
- Inveraray castle 90,000 est

if obviously well below sites down south.

- Stirling Castle 595,000
- Edinburgh Castle 1.9m

11/ The figures for Mull and Iona are currently depressed because of the problems at CalMac. Iona used to average over 130,000 visitors per year.

Employment in tourism

12/ It is estimated that 30% of employment on Mull is directly in tourism which equates to about 600 individuals out of the est 1900 economically active individuals.

13/ Any downturn in tourism would, however, feed through to those who supply the tourism sector e.g. builders, grocers, etc suggesting perhaps 900 jobs overall are potentially effected.

14/ Tourist site visitor numbers respond rapidly to changes to any actual site.

15/ The Oban distillery had 54,000 visitors per annum pre Covid but this was boosted to 157,000 by 2023 after major refurbishment by the owners. The same effect can work in reverse. The Oban distillery may be offering a different form of spiritual solace to Iona but the economics of the tourism sector are the same for both.

Impact of any change to Iona

16/ If a dramatic change to the "Iona experience" due to the W1 Machair project caused a one third reduction in visitor numbers to Iona i.e. by about 35,000 then this might translate into an about 10% reduction in overall visitor numbers to Mull.

---

[4] Sources: ALVA, Visit Scotland, CalMac, estimates. Recent data mostly for 2025.

17/ This would imply a loss of about 90 jobs - though this is a tentative estimate given the poor quality data.

Other impacts on tourism on Mull and other islands

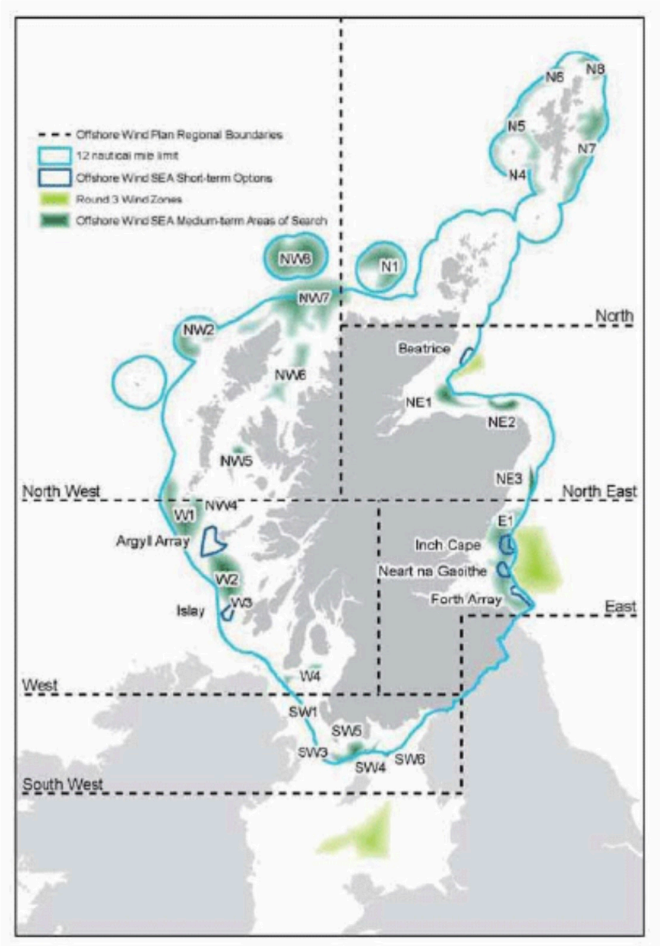
18/ There would in addition be loss of visitors and therefore jobs due to a decline in scenic tourism amongst not interested in Iona.

ATTACHMENT E - OFFICIAL EVOLUTION OF THE W1 MACHAIR BLOCK

Summary

- The area began to come into focus in 2011 and acquired clear boundaries in 2013.
- Other projects in the West Region fell by the wayside.
- In subsequent years the area expanded in a north east direction towards Iona and Colonsay.
- Despite protest from SNH, it became entrenched with minor modifications in the "plan-led" ScotWind round and was awarded to Iberdrola/ScottishPower in 2022.

First policy survey in 2011



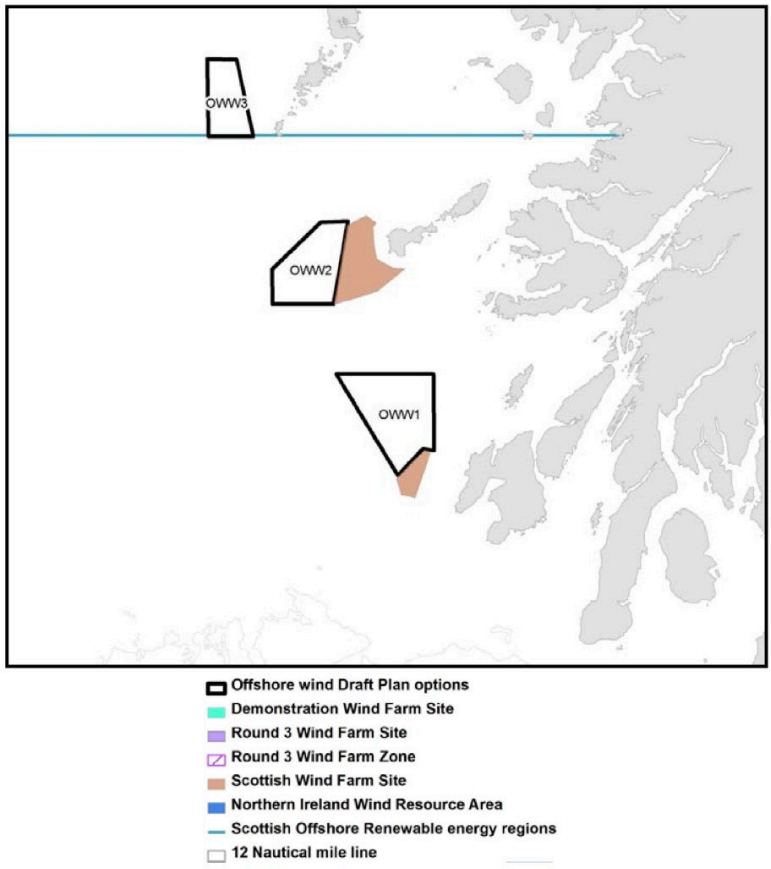
1/ The area which would become the W1 Machair project was first identified in a preliminary survey of potential offshore sites for the "Blue Seas, Green Energy" paper in 2011.

2/ At that time, there were three possible sites off Argyll under consideration: the Argyll Array off Tiree, the Islay project and a less well defined prospect called W2 between them. (The "Western Region" of the Marine Directorate also included another prospect then called W1 off Barra in the Western Isles.)

3/ It should be noted that these ideas were circumscribed by the 12 mile limit because at that point the UK was only legally entitled to exploit resources within that limit.

Initial framework in Draft Sectoral Marine Policy in 2013

Fig.8 West Region - Draft Plan Options and existing planned development



1/ These ideas solidified in 2013 in the draft Sector Marine Policy for Offshore Wind (SMP-OWE) which refined the earlier concepts.

2/ What would become the W1 Machair block now appeared and absorbed two of the prospects in the earlier scheme. It was then called OWW1.

3/ The new block also expanded to the north east in the direction of Iona and Colonsay.

4/ Even at this stage officials were aware of the potential for strong negative effects on the Isles. The 2011 paper highlighted for the West Region the "significant strategic issues relate to visual impact and cultural heritage issues with additional concerns linked to impacts on tourism and recreation".

5/ The draft SMP-OWE was never formally adopted but guided official thinking over the next decade

6/ At the this point the Tiree and Barra prospects were still in the running..

Draft Sector Marine Policy (SMP-OWE) in 2020 - overview

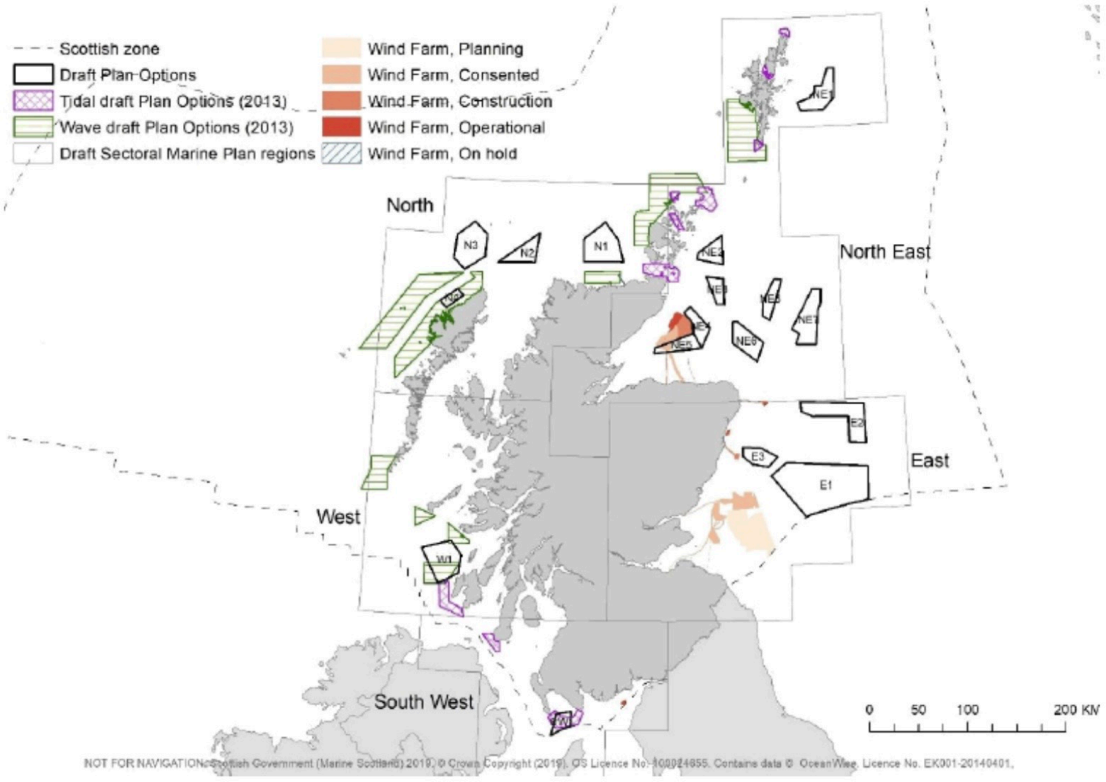


Figure 1 Current and planned offshore energy generation, DPOs and draft Plan regions

1/ By 2019 these ideas had been refined still further and a new draft SMP-OWE appeared in 2020.

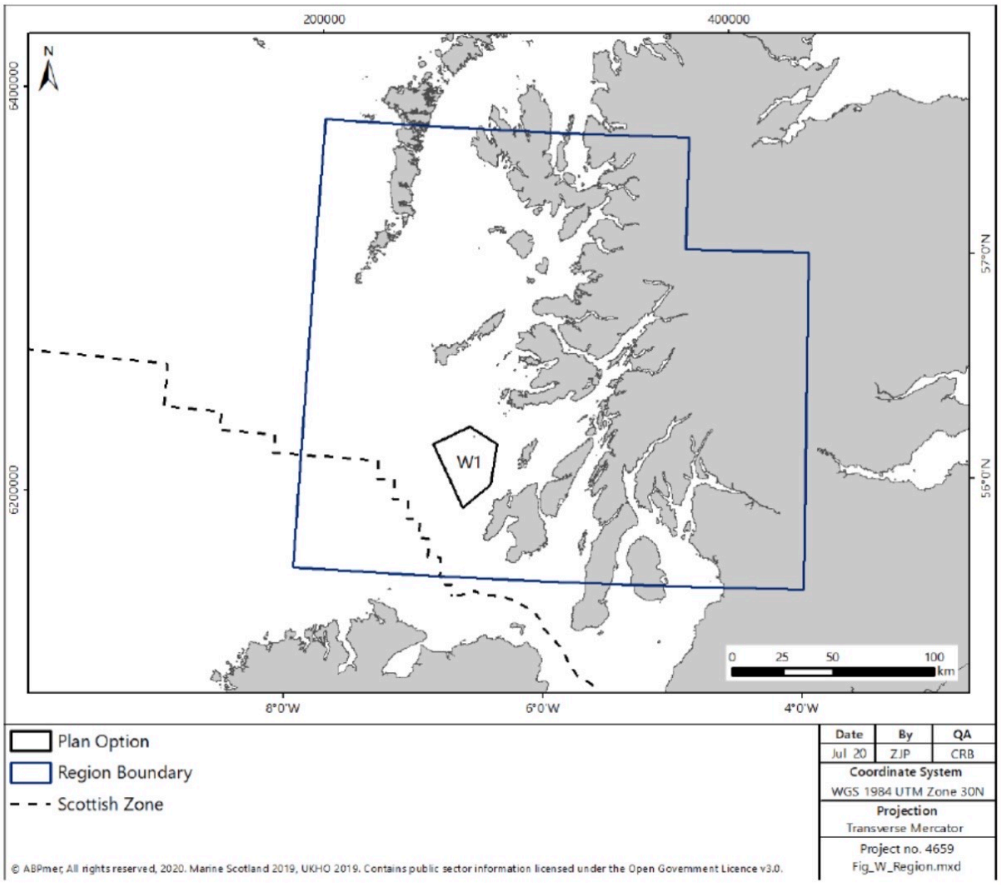
2/ The main development, however, was that in the North Sea the planners were

- exploiting their new freedom since 2013 to break out beyond the traditional 12 mile limit and
- seeking to exploit offshore wind power in the new "Exclusive Economic Zone" (EEZ) which stretched out to as much as 200 nautical miles
- Off the East coast this led to bold plans for a series of wind farms 35 km + from the coast.

3/ There seemed to be less innovation in the plans for wind farms off the West Coast which remained close to shore.

4/ Various tidal and wave energy projects off Argyll were still planned.

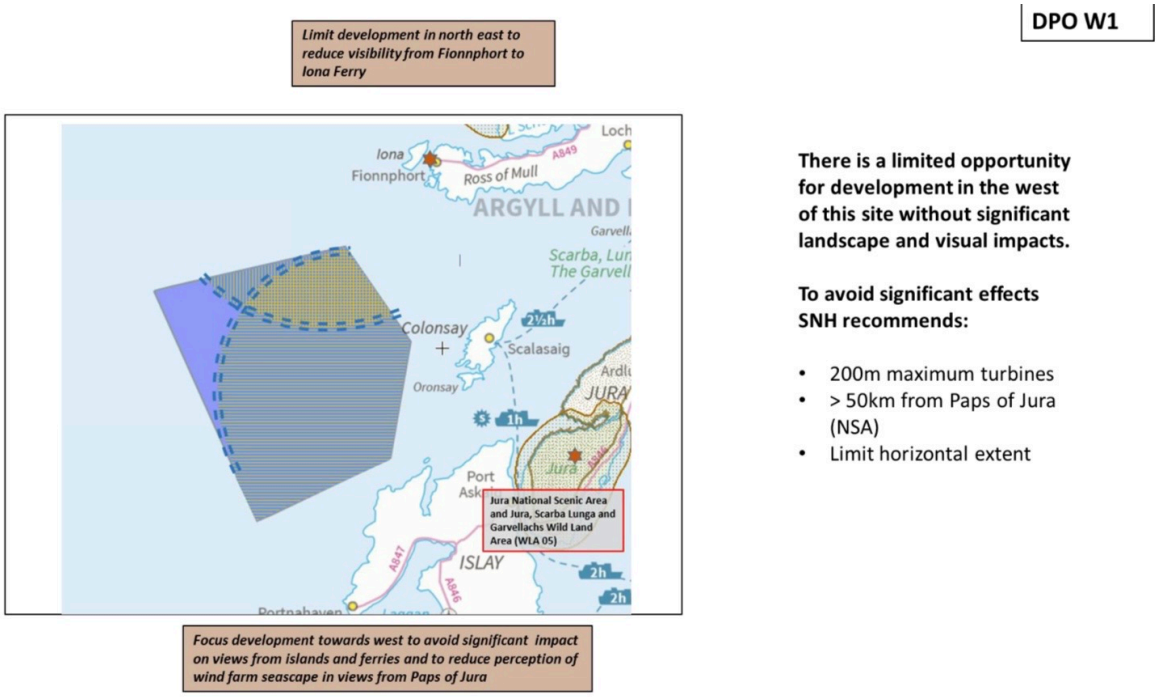
Figure 12 West Region PO



1/ The only surviving offshore wind project in the West Region was the OWW1 project now relabelled W1.

2/ Its boundaries had again been revised and expanded still further south east towards Islay and, even more, to the north east towards Colonsay and Iona.

Recommendations by Scottish Natural Heritage in 2022



1/ These proposals provoked Scottish Natural Heritage (SNH) into revolt.

2/ SNH (now NatureScot) pointed out that

- not only had W1 been expanded and grown closer to various islands but
- wind turbines were now significantly taller than before and would have a significantly greater visual impact on Iona and the Paps of Jura.

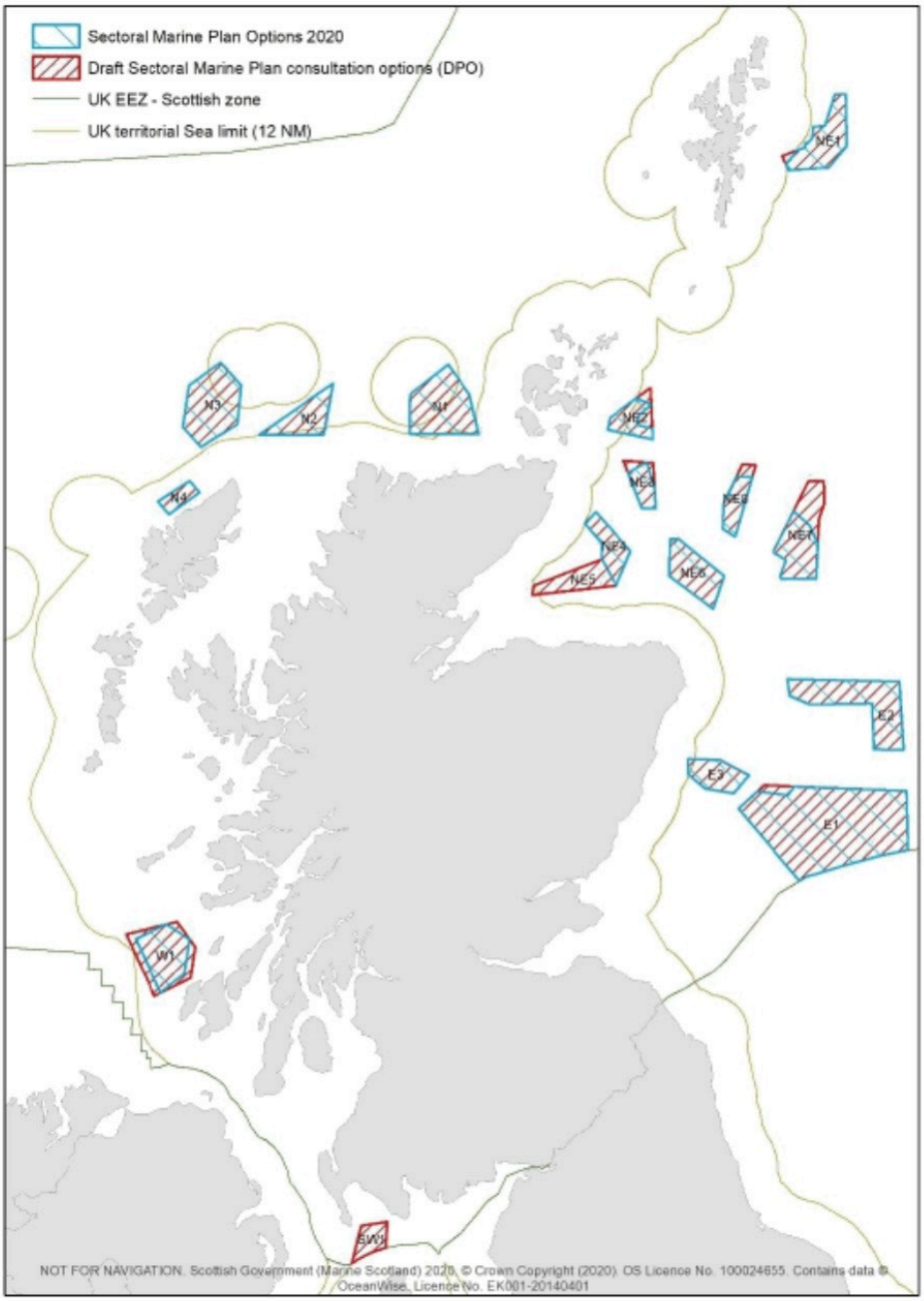
3/ SNH recommended banning

- All wind turbines taller than 200m
- Any wind turbines outside the 20% of the W1 area in the north west corner

4/ SNH was overruled by Ministers and/or the Marine Directorate with little explanation.

Minor changes made as “mitigation”

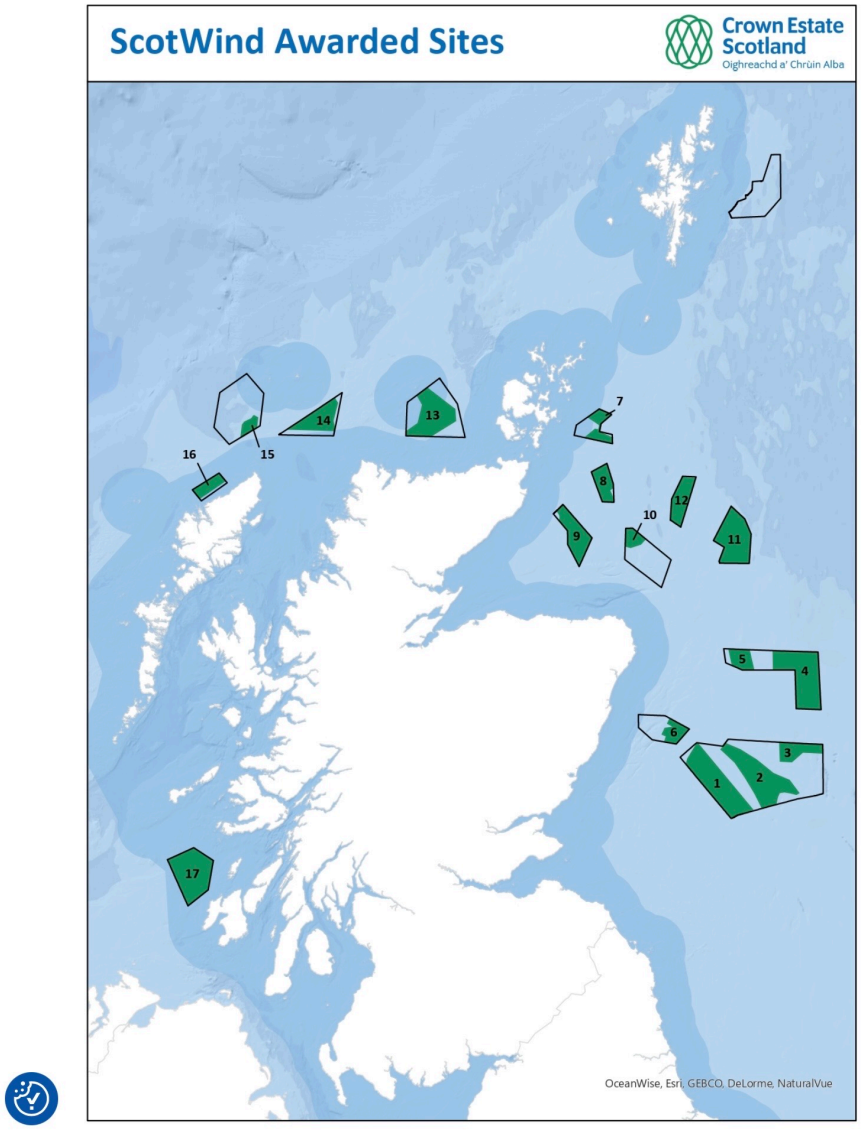
Figure 4 Map demonstrating changes between draft (2019) and final Plan Options (2020)



1/ Although the Marine Directorate ignored SNH’s logic, it trimmed W1 as “mitigation” which did little for Iona.

2/ The largest reduction was ironically in the area SNH had no objections to.

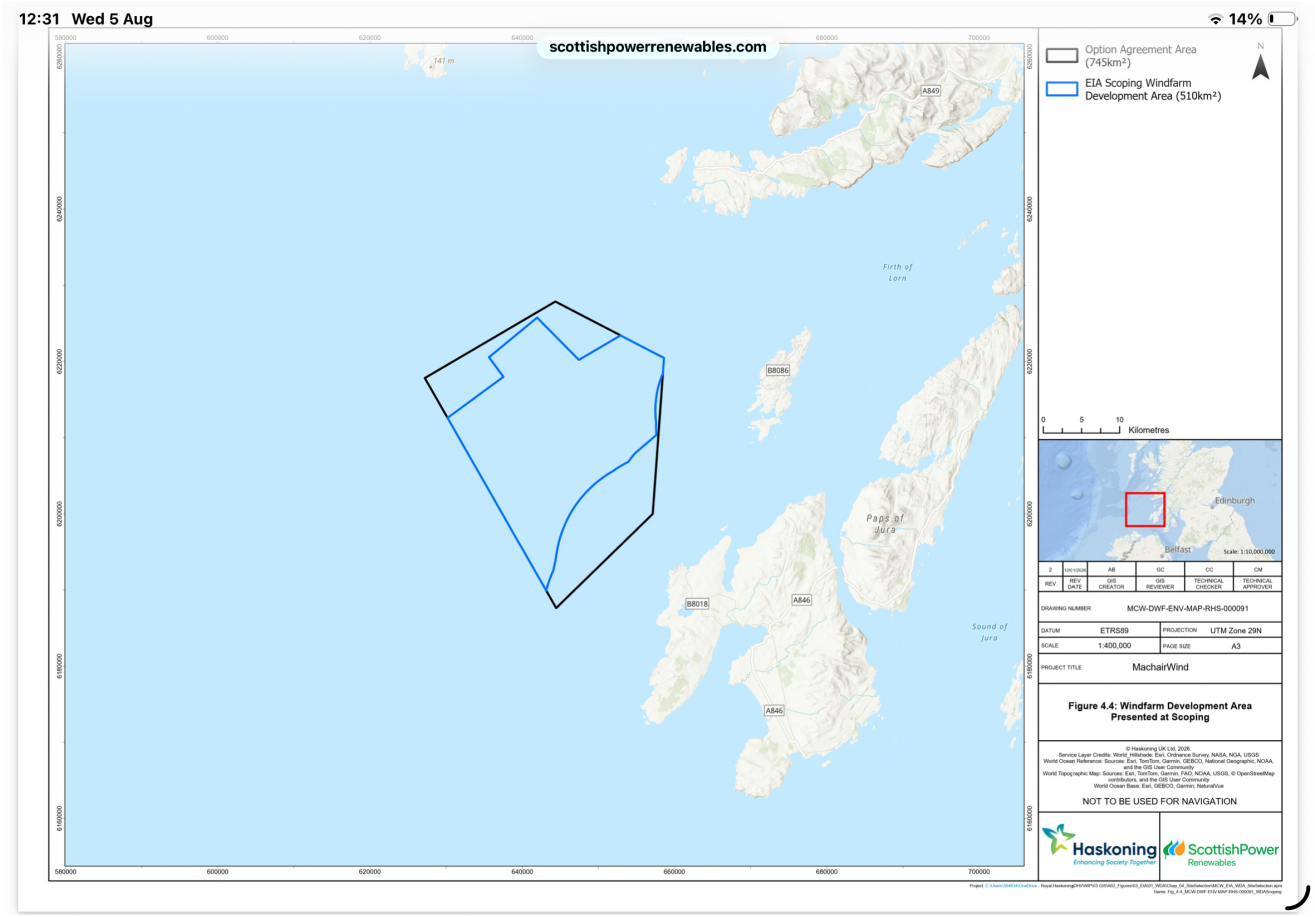
ScotWind lease awards 2022



1/ This then led to the appearance of W1 in the ScotWind leasing round.

2/ In 2022 Iberdrola / ScottishPower won an option to take the lease on W1 with a bid of £75m.

ScottishPower discards portion of lease in 2025



1/ The last development was in 2025 when Iberdrola / ScottishPower discarded 40% of W1 because it was either in too deep water or too close to Islay.

2/ The proximity to Iona and Colonsay was unaffected.

ATTACHMENT F - BACKGROUNDS AND CONTACT DETAILS OF OBJECTORS

Rev. [Redacted] and [Redacted] spent the happiest part of their childhood on Mull in the 1960s with regular visits to Iona.

Their father laboured as a teenager on the rebuilding and restoration of Iona Abbey in the 1940s under the charismatic leadership of Rev. George MacLeod, who had founded the Iona Community in 1938.

[Redacted] has worked in International Development since the mid-80s, both before and after ordination. She worked with Unicef and various international NGOs before setting up and leading the Anglican Alliance, the international development organisation of the Anglican Communion (i.e. worldwide Episcopalian and Anglican churches). R[Redacted] now works as a chaplain at Oxford University but spends university vacations in her house south of Bunessan in the Ross of Mull. This is where she hopes to retire. Rachel is an associate member of the Iona Community.

[Redacted] is retired but previously was Head of Research and Global Strategy at a large investment management company and before that was responsible for investments in the Energy and Mining sectors. He now lives on Loch Awe in the mainland part of Argyll but visits the Ross of Mull and Iona frequently.

Contact details:

[Redacted]

[Redacted]

Member of the Public 4997

From: [Redacted]
Sent: 17 August 2026 14:41
To: First Minister
Subject: Wind turbines

Dear Sir

I hope you can find time to read my e-mail.

I was completely shocked to read the other day that a proposal has been made for hundreds of huge wind turbines to be built close to the beautiful island of Iona. If this proposal is given the go ahead it would be nothing short of a criminal act. It would ruin the wonderful views from and spiritual feeling of this magical place. Also, it will not only denigrate Iona but destroy the magic of the surrounding smaller islands such as Colonsay and Islay.
My late wife and I holidayed on Mull several times and although I am not traditionally religious, visiting the Abbey on Iona and then standing on one of the lovely beaches at the northern tip of the island and looking across a wonderful blue sea to the hills of Mull or the other way to the small islands shimmering in the haze brought me, and my dear wife, closer to something spiritual than we had ever contemplated.
Some of the unique wildlife of that part of Western Scotland will also be impacted.
When I look at old photos of my wife gazing out across the sea from Iona it breaks my heart to think that not only has she gone, but the view that she was taking in, and that brought tears to her eyes, could soon also be gone forever.
These corporate robots could not care less about the cultural or natural history of the Western Isles. For them it as all about politics and money.
Please bring about any power or influence that you have to stop this desecration.

Thank you

[Redacted]

Member of the Public 4998

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	The Machair Windfarm
Date:	30 July 2026 08:02:55

I object to the proposal for this wind farm until further research is available to answer the concerns raised, and a complete application is available.
Yours **[Redacted]**

Member of the Public 4999

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Wind farm proposed off coast of Mull, Iona, Colonsay and Islay
Date: 28 June 2026 20:25:55

Good evening,
I have recently been made aware of the proposal to install a large wind farm off the coast of the Isle of Mull, Iona, Colonsay and Islay. I am very distressed to hear of this and would heavily question the location chosen.
I am an extremely well travelled Nurse from Nottinghamshire in England. Whilst I do not live in the Hebrides, it is somewhere I cherish and frequent every year and have done for the past 5 years. The unique landscape and seascape is such that I have never witnessed anywhere else on earth. I have never witnessed such untouched beauty or the quantity of wild life or sealife as I have seen in this area. I deeply feel that this wind farm would directly and negatively impact the marine life and the bird life in the Hebrides, not to mention the migrating birds.
This is also an area which infrastructure relies heavily on tourism based on its untouched charm and unique wildlife.
I would like to strongly oppose the proposal on the basis that it is likely to negatively impact the wildlife and aesthetic of the area. Not to mention the hard working local people who are likely to be negatively affected by this change.
Kind regards,
[Redacted]

Sent from Outlook for iOS

Member of the Public 5000

From: [Redacted]
To: MD Marine Renewables
Subject: Machair wind
Date: 27 July 2026 13:31:30

Dear Sirs,

I have received a consultation, asking me to sign a petition of objection in respect of the above proposed development and advising me to object to the proposal, which I understand relates to a development of over 100 turbines, each over 200 metres in height, in the area of sea, south-west of Mull and north-west of Islay. I am advised that representations must be received by the Scottish Government by 15 August 2026.

Despite a search for documentation online, I have been unable to access meaningful detail beyond what I have set out above. I hope full details will be widely publicised and a much longer period allowed to encourage informed response.

I am familiar with the above area and have experience of wind farms, having been case officer in my former professional guise in respect of a number of proposals in Skye, albeit approximately 25 years ago.

I recognise the consistently supportive stance of the Scottish Government in respect of wind energy projects over the past 30 years and accept that, given our disproportionate availability of wind, Scotland must accept a larger component of provision in relation to area and population than other parts of the UK. I also recognise that National Park designation has deflected virtually all pressure from both Cairngorms and Loch Lomond and Trossachs, but other areas, such as all of Argyll south of Oban, but especially Kintyre, and Caithness have been swamped! Wind farms have grown much bigger, and their component turbines have doubled in size, while there has been little modification of policy from the core to reflect the public feeling that “we’ve done our bit” and “enough is enough”.

I respect that there are many aspects of wind farm developments. That said, the majority of these concerns, such as ornithology, ground conditions and access, affect only a minority of submissions, such as to become determining issues, whereas visual impact is a determining issue in virtually every case. In the area of the Hebrides now at stake, where the chief landscape characteristic is the renowned contrast between sea, land (often in the form of relatively low and rocky islets) and sky, and the ever changing relationship between these components, which gives the West Coast its unique and worldwide appeal. To thrust a vast field of alien, 200m towers on that resource would be a hugely destructive blow to this renowned asset which is so widely recognised.

I hope the Scottish Government will reject this unacceptable proposal in the wider interest of respecting and conserving the superb environment we are so fortunate to possess.

I’d be grateful if, in the event that I have addressed this submission inappropriately, you would ensure it is forwarded to that department which is responsible for determining marine windfarm submissions.

Yours sincerely,

[Redacted]

Sent from my iPhone

Member of the Public 5001

From: [Redact
To: MD Marine Renewables
Subject: Objection to MachairWind Offshore Wind Farm – Reference: MD-00012385/ MD-00012386
Date: 28 June 2026 12:11:13

Dear Sir or Madam,

I am writing to express my objection to the construction of the MachairWind Offshore Wind Farm.

I cannot object via your website as the link is broken, so I am expressing my objection by email instead. I expect to receive a receipt of acknowledgement that my objection has been registered given your website is not working properly.

Kind regards,
[Redacted]

Member of the Public 5002

From: [Redacted]
To: MD Marine Renewables
Subject: OBJECTION: MachairWind Offshore Wind Farm – Section 36 Consent and Marine Licence Applications
Date: 15 August 2026 08:05:02

Marine Directorate – Licensing Operations Team
Marine Laboratory, 375 Victoria Road
Aberdeen, AB11 9DB
Email: ms.marinerenewables@gov.scot

[Redacted]

[Redacted]

15/8/26

OBJECTION: MachairWind Offshore Wind Farm – Section 36 Consent and Marine Licence Applications

Dear Sir/Madam,

I am writing to formally object to the Section 36 consent and marine licence applications submitted by ScottishPower Renewables for the proposed MachairWind Offshore Wind Farm.

While I recognise the importance of transitioning to renewable energy, the immense scale and inappropriate location of this project will cause irreversible damage to Scotland's natural heritage, fragile island environments, and local economies, while offering virtually no tangible benefit to the local communities affected. I live in Scotland and regularly holiday and visit these areas and cannot comprehend the damage it would do to the local economy.

My specific grounds for objection are detailed below:

1. Irreversible Landscape and Seascape Degradation

The proposal to install up to 144 massive, 340-metre-tall wind turbines just 13 miles from pristine, highly sensitive coastal areas—including Iona, the Ross of Mull, and Staffa—will fundamentally industrialise one of Scotland's most celebrated, wild, and untouched seascapes. This region is world-renowned for its vast, open horizons. Introducing dominant, blinking industrial infrastructure into this panoramic view destroys the unique sense of wildness and spiritual peace that defines the Inner Hebrides.

2. Severe Threat to the Fragile Tourism Economy

Tourism is the absolute lifeblood of Mull, Iona, Colonsay, and Islay. Visitors

travel from across the globe precisely to escape industrial development and experience unspoiled nature. By spoiling these iconic views, the project directly threatens the long-term viability of local hospitality, tour operators, and wildlife guides. The economic fallout from a drop in visitor numbers will devastate these fragile island communities, which rely entirely on a thriving tourism industry to remain viable.

3. Minimal Direct Benefit to Locals and Scotland
The immense environmental and visual sacrifice demanded by this project stands in stark contrast to the minimal benefit it offers to the local people and Scotland as a whole. The electricity generated is destined for the wider National Grid, yet the severe economic, social, and environmental costs are borne entirely by the immediate island communities. This project does not lower local energy costs, nor does it secure long-term, high-quality local employment for islanders, making it an inequitable compromise.

4. Damage to the Marine Environment and Wildlife
The construction and presence of fixed-bottom infrastructure on this scale pose a major threat to the delicate local ecosystem. The Inner Hebrides are vital habitats for vulnerable marine mammals, including minke whales, harbor porpoises, and dolphins, which are highly susceptible to underwater construction noise. Furthermore, the wind farm sits within crucial migratory and feeding pathways for protected seabirds, risking significant population decline through turbine collisions.

For these reasons, the environmental, visual, and economic costs of the MachairWind project vastly outweigh its benefits. I strongly urge the Scottish Ministers to refuse consent for this application in its current form to protect our invaluable natural heritage and island communities.

Please acknowledge receipt of this formal representation and keep me informed of the progress and final decision regarding this application.

Yours faithfully,

[Redacted]

Sent from Outlook for Android

Member of the Public 5003

From: [Redacted]
To: MD Marine Renewables
Subject: Objection – MachairWind Applications (Marine Directorate Refs: 00012385 and 00012386)
Date: 14 August 2026 21:07:38

Dear Sir/Madam

I wish to lodge an objection to the proposed MachairWind wind farm, located off the west coast of Colonsay.

As a business owner on Colonsay, the proposed wind farm would have catastrophic consequences not only to my business, but all the businesses on Colonsay and the surrounding islands. My business is a small art gallery/craft shop, selling local artwork primarily of the untouched landscape which surrounds our beautiful island. Artists are drawn to the island to recreate these landscapes in their work, and in turn the visitors purchase these as a reminder of their stay on our unspoilt island. It is hard to believe anyone would want to purchase a painting of an industrial landscape of 91 to 144 wind turbines, let alone visit our island in the first place.

All of the tourists who have visited my gallery this season have advised that if the proposed wind farm was to go ahead, they would not be returning to the island. These visitors come to Colonsay for peace and tranquility, not an industrial landscape of wind turbines taller than the Eiffel Tower. Running a business on an island is already difficult, with an unreliable ferry service, that if the MachairWind was to go ahead, it would mean the end of all tourism based businesses. These businesses are the lifeline of the island economy, without which would prove fatal to the viability of the island.

I urge Scottish Ministers to reject the application, and hope that a more suitable site can be found.

Yours Faithfully
[Redacted]

Member of the Public 5004

Objection to the Proposed MachairWind Offshore Wind Farm

As trustees of The Erraid Community SCIO and representatives of the Erraid volunteers living on the island, we wish to object to the proposed MachairWind Offshore Wind Farm.

1. Supporting the objections of other island communities

We begin by expressing our strong support for the objections already submitted by the Iona Community, Colonsay Community Council and the community of Islay.

Their submissions contain extensive research and detailed arguments, and we fully support the concerns they have raised. Rather than repeat their legal analysis here, we adopt those arguments as part of our own objection.

We therefore ask the Scottish Ministers to consider this objection alongside those submissions, rather than as a separate case.

2. The application does not meet the necessary legal requirements

Taken together with the evidence presented by the other objectors, we believe the application submitted by ScottishPower Renewables does not meet the legal requirements that apply to it.

On that basis, we believe that neither the Scottish Ministers, when considering consent under section 36 of the Electricity Act 1989, nor the Marine Directorate, when considering the associated marine licences under Part 4 of the Marine (Scotland) Act 2010, can lawfully approve the project in its current form.

Among the concerns set out in the objections we adopt are the following:

- The applicant's own consultants acknowledge that the project could affect the ability of island communities to remain viable places to live. Yet no assessment of this impact has been carried out for the islands closest to the proposed development.
- The applicant's own coastal assessment identifies major and significant visual impacts that have not been adequately addressed or mitigated.
- The applicant has submitted a *Without Prejudice Derogation Case* relating to a protected seabird colony. In our view, this amounts to an acknowledgement that harm to the colony cannot be ruled out.
- Important parts of the onshore development, including the location of the onshore maintenance base, have not yet been decided. This means that the project being considered by the Ministers is not, in reality, a complete project.

These are not minor outstanding details. They concern fundamental questions about the environmental, social and practical consequences of the development.

3. A moral appeal

There is also a wider issue that goes beyond the legal arguments.

We ask the Ministers to do everything genuinely necessary to protect the earning capacity and future viability of the island communities from which this development would be visible. These are communities whose livelihoods depend in large part on an unspoiled landscape, a landscape that is also of deep cultural and spiritual importance.

If the project goes ahead in its current form, a significant part of the value of that landscape would effectively be transferred away from the island communities and towards the shareholders of a Spanish multinational company.

Scotland understands the lasting consequences of decisions that remove economic value from island communities while benefiting interests elsewhere. We ask the Ministers to bear that history in mind when considering this application.We can see no convincing reason why the earning capacity and future prospects of these island communities should be sacrificed in order to maximise returns for a multinational company.

Importantly, alternatives are available. The project could be located much further from the shores, with fewer and lower turbines. The objections we adopt explain in detail that such alternatives were not seriously considered by the applicant because they would not achieve the applicant's objective of obtaining the maximum possible return from the site.

In our view, that is not a sufficient reason to impose these impacts on island communities.

4. Fix the grid first

There is also a straightforward practical reason why consent should not be granted at this stage.

Scotland's electricity transmission network does not currently have the capacity to carry all the electricity already being produced by existing wind farms. As a result, substantial amounts are paid every year to turn wind turbines off because the network cannot take the power they could otherwise generate. The bill for these compensations (340 million in 2025) is paid by the consumers.

Adding another 2GW of generation to an already congested part of the network, before the necessary reinforcement is in place, is a subsidy transfer from the bill payers to the shareholders, dressed up as decarbonisation. It risks increasing costs for electricity consumers while allowing the financial benefits of the development to flow to its shareholders.

We therefore ask that no consent be granted until the transmission network has the capacity to carry the electricity this project would generate.

5. The view from Erraid to Dubh Artach

Finally, we wish to draw attention to a matter specific to Erraid that, as far as we are aware, is not addressed in the other objections before the Ministers.

Erraid is the island from which the Dubh Artach lighthouse was built and serviced. The historic sightline between Erraid and the lighthouse remains unbroken today.

We ask that this sightline be recognised as a specific constraint on any development considered acceptable in these waters.

It provides a clear and tangible example of what is at stake: a historic relationship between an island community and the surrounding landscape that could be permanently changed by this development.

6. Protecting migratory birds through automatic turbine shutdown

If, despite the concerns set out above, the Ministers decide to grant consent for the development, we ask that this consent is subject to a strict condition requiring all wind turbines to be equipped with the most advanced commercially available technology for detecting migratory birds.

Where birds are detected approaching a turbine, the system should automatically stop the relevant turbine in sufficient time to prevent collisions.

Given the importance of the surrounding waters and islands to migratory and protected bird species, we believe that this should be a clear condition of any consent granted, rather than a voluntary or discretionary measure.

The technology used should be kept up to date throughout the lifetime of the development, so that the best available bird-detection and collision-avoidance systems are used as they become available.

Conclusion and requests

For all of the reasons set out above, and for the fuller arguments contained in the objections submitted by the Iona Community, Colonsay Community Council and the community of Islay, which we adopt in full, The Erraid Community SCIO asks:

1. **That the Scottish Ministers refuse consent for the project under section 36 of the Electricity Act 1989.**
2. **That the Marine Directorate refuse the associated marine licence applications under the Marine (Scotland) Act 2010.**

If the Ministers are not minded to refuse consent, we ask instead that:

- the additional information requested in the objections we have adopted is obtained from the applicant before any decision is made;

- the location and likely impacts of the onshore maintenance base are finalised and properly assessed before the application is determined;
- we are notified of, and given a fair opportunity to comment on, any additional environmental information or material changes to the applications before a decision is made; and
- we are promptly notified of the final decision and the reasons for it.

Trustees of The Erraid Community SCIO

Member of the Public 5005

From:	[Redacted]
To:	MD Marine Renewables
Cc:	[Redacted]
Subject:	MachairWind EIA – Manx shearwater assessment and Lunga tracking evidence
Date:	21 August 2026 08:01:31

Dear Marine Directorate and NatureScot,

Re: MachairWind Offshore Wind Farm – adequacy of Manx shearwater assessment and Treshnish Isles population

I am writing to ask Marine Directorate and NatureScot to examine what appears to be a significant unresolved issue in the MachairWind ornithological assessment concerning Manx shearwaters breeding on Lunga in the Treshnish Isles.

SPR funded NTS to undertake the first GPS tracking study of Manx shearwaters breeding on Lunga in 2025 because the at-sea distribution of this population was poorly understood.

The results appear highly significant.

Only seven birds produced usable resolved tracks, yet five of those seven entered the MachairWind Windfarm Development Area.

The tracking did not demonstrate simple transit alone. The NTS report identified apparent foraging within the WDA and prolonged rafting/resting within it, including one bird apparently rafting for approximately four hours.

NTS therefore concluded that the study confirmed connectivity between the Lunga population and MachairWind and indicated that the development footprint was being used for foraging and resting.

However, NTS also made clear that this was a very limited pilot study.

It covered only a short period of the breeding season, from approximately 15–26 June 2025. There were difficulties downloading data from the tags, meaning some GPS information was probably lost. NTS consequently recommended further tracking at different stages of the breeding season to obtain a more complete understanding of the population's space use.

Despite this recommendation, the MachairWind application has proceeded without that fuller tracking work having been completed.

I am particularly concerned by the way these results appear subsequently to have been interpreted in the EIA.

The conclusion that the WDA is not an area of particularly high importance for Manx shearwater appears difficult to reconcile with the degree of uncertainty acknowledged by NTS.

A sample of seven birds cannot establish that the WDA is important to 71% of the entire Lunga population.

But equally, a small sample in which five of seven tracked birds entered the development area cannot reasonably demonstrate that the WDA is unimportant to that population.

The appropriate scientific conclusion would appear to be that direct connectivity has been demonstrated but its true extent remains uncertain and requires further study.

There is an additional issue concerning the population against which MachairWind assesses importance.

The Treshnish Isles Manx shearwater population is not an unknown quantity.

The Seabird 2000 census recorded approximately 1,283 Apparently Occupied Sites, while a complete TIARG census of Lunga in 2018 estimated 1,992 breeding pairs, equivalent to approximately 3,984 breeding adults.

This 3,984-adult population estimate is sufficiently established that it has already been used in the formal ornithological apportioning assessment for another major offshore wind development.

MachairWind's own consultants use Seabirds Count and the Seabird Monitoring Programme database to derive contemporary breeding-population estimates for numerous species and colonies, including Treshnish Isles colonies.

However, Manx shearwater does not appear to receive an equivalent Treshnish-specific population assessment in MachairWind's Regional Breeding Adult Population Estimates.

Instead, the significance of Manx shearwater use of the WDA is considered partly against a very large regional population potentially capable of reaching MachairWind.

That answers a different ecological question.

A population being theoretically capable of reaching MachairWind is not the same as a population empirically demonstrated by GPS tracking to use MachairWind.

I would therefore be grateful if NatureScot and Marine Directorate could specifically address the following:

1. Given that five of seven successfully tracked Lunga Manx shearwaters entered the WDA, does NatureScot agree that direct connectivity between the Treshnish breeding population and MachairWind has been demonstrated?

2. Does NatureScot consider seven usable tracks collected during one short period of the incubation stage sufficient to determine the importance of the WDA to the Lunga population?

3. Given NTS's explicit recommendation for further tracking at other stages of the breeding season, why should that work not be completed before conclusions concerning the importance of the WDA are accepted?

4. How has the likely loss of some GPS data during the pilot study been reflected in the uncertainty attached to the conclusions?

5. Why has a Treshnish-specific population sensitivity assessment apparently not been undertaken using the established population estimate of approximately 1,992 breeding pairs / 3,984 breeding adults?

6. Why does MachairWind rely substantially upon comparison with a very large regional Manx shearwater population potentially within theoretical foraging range when direct GPS evidence exists for a much smaller identifiable breeding population on Lunga?

7. Does NatureScot consider that use of such a large regional denominator could obscure an ecologically important effect upon a much smaller directly connected local breeding population?

8. Why is Manx shearwater omitted from the conventional quantitative collision-risk and displacement/apportioning pathways and instead assessed semi-quantitatively, despite direct evidence of WDA use?

9. Given that NatureScot has recognised that digital aerial surveys may under-record Manx shearwaters because of their behaviour and detectability, what weight should be placed upon the independent GPS evidence?

10. How has the risk from artificial turbine lighting been assessed when normal low flight height is relied upon in judging collision risk, but artificial lighting itself may cause attraction, disorientation and altered flight behaviour?

11. How has SPR's unexplained April 2022 aggregation of approximately 2,865 Manx shearwaters in the WDA and buffer, around 85% of which were sitting on the sea, been reconciled with the conclusion that the WDA is not an important rafting/foraging area?

12. Does NatureScot consider that the available evidence demonstrates a non-significant effect, or does it instead demonstrate substantial uncertainty which requires further environmental information before determination?

The last question is particularly important.

The issue is not whether the existing GPS study proves that MachairWind will significantly harm the Lunga population. With only seven usable tracks, it plainly cannot do so.

The issue is whether the available evidence is sufficient for SPR to demonstrate the opposite.

SPR commissioned the study because there was a recognised knowledge gap. The study then found direct WDA connectivity in five of seven tracked birds, including apparent foraging and prolonged rafting. NTS acknowledged limitations in the data and expressly recommended further tracking.

It therefore seems difficult to understand how the outstanding uncertainty can properly be converted into a conclusion that the WDA is of low importance before the recommended additional work has been undertaken.

I would respectfully request that NatureScot and Marine Directorate consider whether Further Environmental Information should be required from SPR, including additional seasonal GPS tracking and a Treshnish-specific population sensitivity assessment, before the Manx shearwater assessment is accepted as sufficiently robust for determination.

Yours sincerely,

[Redacted]

[Redacted]

Sent from Outlook for Android

From:	**[Redacted]**
To:	MD Marine Licensing; MD Marine Renewables; **[Redacted]**
Cc:	**[Redacted]**
Subject:	MachairWind/Ocean Quahog
Date:	20 August 2026 12:07:15

Dear Marine Directorate and NatureScot,

I am writing to raise what I believe is a significant issue concerning the assessment of Ocean Quahog (Arctica islandica) within the MachairWind Windfarm Development Area, and in particular the reliance placed upon future micrositing as mitigation.

Having examined the MachairWind benthic ecology material and associated survey reports, I would be grateful for a substantive response to the following points.

Ocean Quahog is demonstrably present.

Ocean Quahog is a Scottish Priority Marine Feature (PMF) and is also included on the OSPAR list of threatened and/or declining species and habitats.

This is not simply a species which might theoretically occur within the MachairWind area.

The 2021 survey recorded 13 live Ocean Quahogs at 13 separate grab stations, with most records reported in the central part of the Windfarm Development Area.

More importantly, these were not isolated findings which subsequently disappeared.

MachairWind's own 2023 investigations again found Ocean Quahog. Adult and juvenile animals were recorded at numerous grab stations across the survey area. The 2023 results identify Ocean Quahog at 16 separate grab stations, while the video survey records evidence at numerous further locations, including evidence considered to represent living animals.

The presence of juvenile Ocean Quahogs seems particularly important because it demonstrates a living and recruiting population rather than merely the presence of historic shells.

The geographical spread of these records also indicates that Ocean Quahog is not confined to one small, readily identifiable feature which can simply be avoided.

The extraordinary longevity of this species.

The EIA itself recognises that Ocean Quahog is approximately 11–13 cm in size, lives buried within the sediment and is an exceptionally slow-growing and long-lived species, with individuals capable of living for more than 500 years.

This makes the proposition that damage can subsequently be compensated for particularly difficult to understand.

Destruction of an individual potentially several centuries old cannot meaningfully be mitigated by assuming that another individual may eventually occupy the area.

SPR's own sensitivity assessment.

Of particular concern is that SPR's assessment recognises Ocean Quahog as having:

Low tolerance/resistance to permanent habitat loss
Very low recoverability
High sensitivity.

Yet despite this, the assessment ultimately reduces the magnitude of permanent habitat loss from low to negligible, with proposed micrositing forming part of the justification for that reduction.

I would therefore like to understand precisely what evidence demonstrates that this mitigation will actually work.

The fundamental problem with micrositing-

An Ocean Quahog is a relatively small animal which spends much of its life buried within seabed sediment.

By comparison, the MachairWind design envelope allows monopile foundations of up to approximately 13 metres diameter.

A 13 m diameter pile has a direct footprint of approximately:

132.7 m².

A 0.1 m² benthic grab, by comparison, samples just 0.1 m².

The pile footprint alone is therefore approximately 1,327 times larger than a single grab sample.

This is before considering scour protection, seabed preparation, jack-up vessel legs, anchors, inter-array cables and other construction disturbance.

The EIA identifies potential seabed disturbance extending into millions of square metres.

I therefore struggle to understand how moving a turbine foundation a relatively short distance can be described as avoidance of Ocean Quahog unless SPR first possesses a survey methodology capable of demonstrating that the alternative location is actually unoccupied.

Absence of detection is not evidence of absence -

This appears to be particularly important for Ocean Quahog.

The species lives buried beneath the sediment.

Geophysical techniques such as multibeam, side-scan sonar and sub-bottom

profiling can characterise seabed habitats and geological features, but they cannot identify every individual 10–13 cm bivalve buried beneath the sediment.

Drop-down video has similar limitations.

Indeed, MachairWind's own survey records include descriptions such as “possible ocean quahog” and “possible ocean quahog siphons”.

If dedicated ecological survey footage cannot always establish whether an Ocean Quahog is present, it is difficult to understand how video can subsequently demonstrate that a proposed foundation footprint is free of them.

Grab sampling can detect buried animals, but samples only a tiny proportion of the seabed.

There is also an extraordinary example within MachairWind's own 2023 survey records at station MCW-C-ST53, where the survey log records:

“Damaged A. islandica.”

In other words, the sampling process itself encountered and damaged the very species which future micrositing is supposed to avoid.

At the nearby station MCW-C-ST54, an Ocean Quahog of approximately 9 cm was also recorded and returned to the sea.

This illustrates the fundamental detection problem.

A negative grab does not demonstrate that the surrounding foundation footprint contains no Ocean Quahogs. It merely demonstrates that none was detected within that very small sample.

Scale of the sampling -

The 2023 benthic survey used 57 grab stations, each sampling approximately 0.1 m².

That equates to only around 5.7 m² of seabed physically sampled by those grabs across an enormous survey area.

Yet approximately 16 of those 57 stations contained adult or juvenile Ocean Quahog.

That is approximately 28% of the grab stations.

I am not suggesting that this figure can simply be extrapolated to produce a population density across the whole Windfarm Development Area; the survey was not designed for that purpose.

It does, however, raise an extremely important question:

If Ocean Quahog was detected at approximately 28% of these widely separated grab stations, what exists in the enormous unsampled areas between them?

The existing survey cannot answer that question.

No final turbine positions -

There is then an additional difficulty.

As I understand the application, the precise locations of the proposed 91–144 turbines have not yet been determined.

The final turbine layout will be developed subsequently through detailed design.

Therefore SPR does not presently know the precise seabed footprint of each turbine foundation.

This leads to what appears to me to be a fundamental problem with the sequence of the assessment.

The logical process would appear to be:

Survey, identify receptor, determine foundation position, demonstrate avoidance and then assess residual impact.

Instead, the MachairWind assessment appears effectively to be:

Broad-scale survey, establish Ocean Quahog is present, assume future micrositing, reduce assessed magnitude and then determine actual foundation positions after consent.

If that interpretation is incorrect, I would be grateful if you could explain why.

“Where practicable” -

I am also concerned about the qualification attached to the micrositing commitment.

The mitigation commitment refers to micrositing infrastructure around sensitive habitats “where practicable.”

The final turbine layout will inevitably have to accommodate numerous competing constraints, including engineering and geotechnical conditions, turbine spacing, wake effects, water depth, cables, navigation, aviation, other environmental receptors and visual-design considerations.

Ocean Quahog avoidance is therefore only one constraint amongst many.

What happens if avoiding an area containing Ocean Quahog is not considered practicable?

More fundamentally, how can the residual environmental effect presently be reduced on the assumption of successful micrositing when the commitment itself only requires avoidance where practicable?

Pre-construction survey commitment -

I would also appreciate clarification regarding the Outline Environmental Management Plan.

My reading is that the relevant pre-construction benthic survey commitment expressly refers to determining the presence of the PMF Offshore Subtidal Sand and Gravels, with micrositing undertaken where possible.

I have been unable to identify an equivalent explicit commitment requiring foundation-scale pre-construction presence/absence surveys for the Ocean Quahog PMF itself.

If such a commitment exists, I would be grateful if Marine Directorate or NatureScot could identify precisely where it is contained within the application.

Questions requiring clarification-

I would therefore be grateful for responses to the following:

1. What survey methodology will be used to establish the presence or absence of Ocean Quahog within each proposed turbine-foundation footprint and associated scour/seabed-preparation area?

2. What spatial resolution will that survey achieve?

3. What is the scientifically established probability of detecting an Ocean Quahog using that methodology?

4. How will absence of detection be distinguished from genuine absence?

5. If an Ocean Quahog is detected and a foundation is moved, how will SPR demonstrate that the alternative location does not contain further undetected individuals?

6. Given that approximately 16 of 57 grab stations in the 2023 survey recorded adult or juvenile Ocean Quahog, what statistical assessment has been undertaken of the likelihood of Ocean Quahog occurring within the unsampled seabed between those stations?

7. What minimum survey intensity and detection probability will Marine Directorate and NatureScot require before accepting a proposed foundation location as being free of Ocean Quahog?

8. Does NatureScot consider broad-scale habitat mapping sufficient evidence upon which to claim avoidance of individual Ocean Quahogs?

9. Why does the Outline Environmental Management Plan appear expressly to require pre-construction investigation of Offshore Subtidal Sand and Gravels, but not an equivalent foundation-scale investigation specifically for Ocean Quahog?

10. Given that the final turbine positions have not yet been established, on what evidential basis can micrositing presently be credited with reducing the magnitude of permanent habitat loss?

11. How can an impact be reduced from low to negligible because of micrositing before the locations being microsited, the locations they may be moved to, and the presence or absence of Ocean Quahog at those alternative locations are known?

12. What happens if avoidance of Ocean Quahog conflicts with engineering, turbine-spacing, cable-routing or other constraints and is consequently determined not to be "practicable"?

Conclusion -

I am not suggesting that micrositing can never constitute effective environmental mitigation.

Micrositing around a clearly mapped reef, habitat boundary or other readily detectable feature is entirely understandable.

However, micrositing around a small, cryptic animal which lives buried beneath the seabed presents a fundamentally different problem.

MachairWind's own surveys demonstrate that Ocean Quahog is present at numerous geographically separated locations, including juvenile animals. The survey methods used to establish the baseline were designed principally to characterise habitats over a very large area; they do not appear capable of demonstrating absence at the spatial scale of an individual turbine foundation.

It therefore appears that SPR is presently claiming the environmental benefit of micrositing before it knows the final foundation locations, before it knows where those foundations would have to be moved to, and before it has demonstrated that those alternative locations are free of Ocean Quahog.

Given the status of Ocean Quahog as a Priority Marine Feature, its high sensitivity to permanent habitat loss, its very low recoverability and its extraordinary longevity, I do not believe that an assumption of future successful avoidance should be sufficient.

I would therefore be grateful if Marine Directorate and NatureScot could confirm whether they accept SPR's reliance upon micrositing as effective mitigation for Ocean Quahog and, if so, provide the scientific and evidential basis upon which that conclusion is reached.

I would particularly welcome confirmation as to whether either organisation considers the evidence currently presented sufficient to justify reducing the assessed magnitude of permanent habitat loss from low to negligible before the final turbine layout and foundation-scale Ocean Quahog surveys exist.

I look forward to your response.

Kind regards,

[Redacted]

Sent from Outlook for Android

Member of the Public 5006

Objection to the applications made by MachairWind Ltd for consent under Section 36 of the Electricity Act 1989 and for the associated Marine Licenses under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed MachairWind Offshore Windfarm (Marine Directorate references 00012385/00012386).

INTRODUCTION

In the Planning Statement for the Machair Wind Farm application case reference 00012385 to the Marine Directorate, Section 6.2.4 'Visual Environment', it concludes:

> '*…the significant adverse effects on the qualities for which the area has been designated are* ***outweighed by the social, environmental and economic benefits of national importance which would be delivered by the Project.***'

Likewise under Section 6.2.5 'Cultural Environment', it concludes:

> '*As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that* ***substantial harm would not arise to any designated heritage assets'***

What it is important to check, is in the light of Iona's spiritual and cultural national and **world** importance, **has the island been fairly assessed and scored in the EIA documentation, against the relevant Scottish Planning Policies, such that the Planning Statement can draw these conclusions?**

1. POLICY CONTEXT

Historic Environment Policy for Scotland (HEPS): Issued by Historic Environment Scotland (HES), this document sets out core policies (such as Policy HEP4), which explicitly demand that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

> *'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.*
>
> *'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.*'

National Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development proposals affecting scheduled monuments will only be supported where:

i. ***direct impacts*** *on the* ***scheduled monument*** *are avoided;*

ii. ***significant adverse impacts*** *on the integrity of the* ***setting of a scheduled monument*** *are avoided; or*

iii. *exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

Scotland's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23 *Designated heritage assets* – representing sites of national or international significance for which statutory requirements apply.

> *'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'*

2. ANALYSIS OF THE PLANNING STATEMENT

The Planning Statement in Section 6.2.4.2.3 states:

> *178: As for the nationally and locally designated landscapes above, it is the LCTs and CCAs in closest proximity to the WDA that were predicted to experience significant adverse effects. Major adverse effects were identified on LCTs across Colonsay, Oronsay and northwest Islay, with effects reducing to* ***moderate adverse significance on Iona,*** *the Rinns of Islay and the south and west coast of the Ross of Mull.*

They are clear that there are effects on the island of Iona's setting determined as 'moderate adverse.' They go on as follows in their conclusions about the impact on particular visual receptors.

> *179: Similarly, effects on visual receptors at identified viewpoints or at settlements and travelling on routes were of major adverse significance at the closest locations to the Project (VP14 Colonsay, VP13 Oronsay, VP 1, 2, 3, 4 northwest Islay),* ***with effects reducing to moderate adverse at a greater distance from the WDA or from elevated positions on*** *Islay (VP5 and 7), Colonsay (VP9, 15 and 16), Jura (VP10), Mull (VP20 and 21) and* ***Iona (VP22)***

This scoring outcome (moderate adverse) determined specific to Iona is for the setting of the Abbey and Nunnery, the Conservation Area and the approach route from Fionnphort to the island. They conclude from these assessments that:

> *'Whilst the relevant policies do not reference effects on these receptors, the nationally significant beneficial effects of the Project and its contribution to achieving Scotland's offshore wind ambition, net zero and decarbonisation targets* ***outweigh the identified significant effects.'***

This means that the scale of detrimental impact to Iona and its listed buildings is not of such substance as to outweigh the economic and social advantages of the development. They acknowledge the adverse impacts ('harm') but say that only limited areas are subject to major adverse effects and that Iona is not amongst these in any case

*'The Project would give rise to some **limited major adverse** effects on SLVIA receptors. However, major adverse effects are not experienced at the most sensitive nationally-designated landscapes. Effects at the Jura NSA were identified on relatively few aspects/locations within a small subset of SLQs for which the area is designated, and it is **therefore demonstrated that the overall integrity of the area will not be compromised.'***

Crucially they conclude and reiterate that any detrimental impact is outweighed by the project benefits.

*'In addition, the significant adverse effects on the qualities for which the area has been designated are **outweighed by the social, environmental and economic benefits of national importance** which would be delivered by the Project. Further detail on the balance between the identified significant effects and the Project's social, environmental and economic benefits is set out in Section 7.'*

Should however the EIA scoring be proved to be incorrectly assessed then there may be a case for reconsideration of the Planning Statement conclusions, that is, is the detrimental impact caused greater than anticipated such that the conclusions might be altered?

3. ASSESSMENT OF DETRIMENTAL IMPACT TO A HERITAGE ASSET

In Section 6.2.5.2 'Planning Assessment Conclusions for Cultural Environment' of the Planning Statement, (paragraphs 186 to 194) expands on how the threshold of detrimental impact is considered:

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

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

How 'harm' to, or detrimental impact on, the heritage asset is defined is therefore important. The planning statement goes on to determine how detrimental impact is defined and recourses to legal case to support its position. It states:

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

that substantial harm presents a high bar.

The planning statement is correct in that case law in England does set a high bar based on case history. However Scottish Law is different. While English case law sets a high bar, Scottish planning law operates under a distinct framework. The submission incorrectly applies an English legal test to a Scottish planning context, where it holds no material weight or binding authority. The applicant's assessment of heritage impacts relies on English High Court precedents—specifically *Bedford Borough Council v SSCLG* and its subsequent updates. In the English planning context, these cases dictate that harm to a heritage asset is only 'substantial' if its significance is entirely 'drained away' or 'vitiated.'

However, this baseline is not applicable to the MachairWind application for the following reasons:

- **No Binding Precedent:** English High Court decisions are not binding authorities in Scotland. The Scottish planning system is separate, governed by its own primary legislation and national policy framework.

- **Policy Misalignment:** The distinct English categorization of heritage impacts into binary thresholds ('Substantial Harm' versus 'Less than Substantial Harm') does not exist within Scottish planning policy. By framing the assessment around this specific English legal threshold, the submission does not align with the statutory requirements of Scottish planning law.

4. EIA ASSESSMENT: EIAR

The Planning Statement goes on to clarify that detrimental impact ('harm' as the applicant states) can only be assessed dependent on an independent assessment - in this case the EIA:

> *The test of whether harm would be substantial is independent of valuation of the asset, and therefore reference to criteria used in the EIAR for establishing the magnitude of impact are relevant.*

Examination of the EIAR, in particular Chapter 14 and its Appendix 14 provided by the applicant, therefore needs to be undertaken to check that all the relevant criteria have been assessed and a fair and reasonable assessment of impacts has been determined such that the Planning Statement is correct in stating:

> *191 As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets.*

Given the outcome of these assessment conclusions showing that impacts are not above a threshold, the Planning Statement concludes that the statutory requirements have been met.

> *Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.*

This of course depends on the EIA assessment having considered all the criteria fairly and reasonably.

5. ADVERSE IMPACT IN THE SCOTTISH PLANNING POLICY CONTEXT

Given that the 'high' legal bar for adverse impact to a Heritage Asset, as asserted by the applicant, does not exist in the Scottish Planning Context, the Planning Statement does offer a more conciliatory reading:

> *'190 cont. Chapter 14 Offshore Archaeology and Cultural Heritage of the EIAR defines a high adverse impact as where 'key elements of the asset's fabric and/or setting are lost or fundamentally altered, such that the asset's cultural significance is lost or severely compromised.*
>
> *'While this represents a relatively coarse banding of magnitudes of impact up to and including total loss of a heritage asset, this is a **useful lower threshold for harms that could be considered to be substantial** and which would require consideration under this policy.*
>
> *'NPF4 refers to the concept of integrity of setting defined by HES as "changes to factors of setting that contribute to cultural significance such that understanding, appreciation and experience of an assets are not adequately retained will affect the integrity of setting".'*

What is not made clear is that in Scotland heritage impact must be assessed against Policy 7 (Historic Assets and Places) of NPF4. Policy 7 critically **does not require an asset's significance to be completely destroyed ("vitiated") before an application can be refused.**

Instead, NPF4 Policy 7c explicitly mandates that development proposals affecting a listed building or its setting will only be supported if they "preserve its character, special architectural or historic interest."

The question to be determined by examination of the EIAR is how the insertion of 91nr, 340-metre-tall wind turbines into the open seascape that forms the historic and spiritual backdrop of Iona and the link back to Ireland, does not breach the threshold of concern regarding how the development directly affects the ability to "preserve" its setting.

In the Planning Statement's view, Chapter 14 and Appendix 14 assessments confirm that the threshold of concern is not breached and '*the fundamental relationship between these assets and their surroundings, with historical, functional and cultural links to the sea, and the landscapes surrounding the Scheduled Monuments remain in essence unchanged*'. This is not an accurate assessment.

This statement shows the importance of checking and determining whether, as per the scoring conclusion of the EIAR, that there are, as the Planning Statement is concluding, '(193) *No adverse effects to integrity of setting therefore relate to a **fundamental** shift in the relationship of an asset*

in its surroundings that would arise through loss or radical change to fundamental elements of that setting.'

The Planning Statement suggests an acceptable balance is achieved because the historic and cultural settings remain visible despite the scale and proximity of the Windfarm. In practice, however, these settings cannot be separated from the visual impact of the development. The applicant is effectively asking the Marine Directorate to accept that the historical asset can still be appreciated, despite its setting being significantly altered and compromised by the project.

> *193 cont In addition, the perceptual prominence of the assets remains over the WDA infrastructure. While there would be, in some cases, a reduction in the perceived remoteness or expression of dominance, these characteristics would remain legible and understandable to a viewer and their ability to appreciate the contribution of those characteristics to the asset would remain.*

The final conclusion confirms the stance of the Planning Statement, which based on the EIA Chapter 14 and Appendix 14 assessments, no threshold is crossed.

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

It is the criteria that lead to this conclusion contained within Chapters 14 and Appendix that requires to be checked against Policy HEP4.

It explicitly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed – not simply accepted as tarnished.**

6. HERITAGE PROTECTION IN SCOTLAND

Under the Historic Environment Policy for Scotland (HEPS), heritage protection is balanced through carrying out a qualitative assessment of an asset's "cultural significance" and its relationship with its environment.

Historic Environment Scotland's Managing Change guidance defines setting as the way in which the surroundings of a historic asset or place provide its context, experience, and understanding.

In this case the open, uninterrupted western and southern seascapes are intrinsic to how Iona has been experienced for centuries as a place of isolation, pilgrimage, and spiritual reflection. The industrialisation of this horizon will directly affect that setting.

HES referred the applicant to the EIA handbook in their various consultations. The opening section of the handbook summarises the assessment criteria:

> *6. 7. The simplest definition of "Landscape" is "the appearance of the land". Landscape is everywhere and may comprise rural landscape, urban landscape (or townscape), urban*

fringe landscape, coastal landscape, seascape, etc.

However, human perceptions of place also include things that cannot be seen but which add to the appreciation of places; these are:

a. feelings generated by other senses – touch, hearing, smell, taste;

b. feelings generated by a knowledge of the place (its cultural and historical associations with people, events, etc.);

c. feelings generated by past experience of the place, or similar places – life experience.

6.8: These combine to give an experience of landscape perceived by all the senses – sight, sound, smell, touch, taste – and by knowledge.

Two of the three factors that make up a landscape are mental not physical that is 1) '*knowledge*' and 2*) 'past and life experience*'.

The following assessment reviews how the application submission Appendix 14.3 assesses these two significant criteria in relation to Iona.

HES (13/06//25) refer to their 'Managing Change: Setting (2020) document. HES are recorded by the applicant in 14.3 as saying that (with suggested grammatical corrections in brackets)

'*highlighted that impacts that (make) change to a setting that effects the way an asset is understood appreciated and experienced(,) then the integrity of the setting is affected*' .

HES in their scoping discussion with the applicant (9/01/25) are recorded as stating that;

'On the basis of the information provided to date, it is likely that the proposed windfarm would impact the setting of a number of scheduled monuments.'

Assessing that impact fairly and responsibly is the role of the EIAR.

7. APPLICANT'S ACCEPTED VISUAL IMPACT OF TURBINES

The applicant states that their wind turbines (WTG) **will disturb and alter the setting of the Historic Assset.** In their Appendix 14.3 they say as much and many times. Here is a selection:

The nearest WTG will be located c.24 km from St. Mary's Abbey. The ZTV (Figure 8), visualisations (Figure 9, Figure 10 and Figure 11), and site walkover all indicate that the ***presence of the WTGs would represent a discernible change to the setting of St. Mary's Abbey.*** *The visibility of the WTGs would be greatest on the east side of the scheduled area (towards the foreshore) with the WTGs falling away as the viewer moves westward towards the Abbey.*

Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide clearer visibility of the proposed WTGs across an approximate 10-dearee arc of view. ***In these views there would be a degree of juxtaposition of the WTGs with the Abbey,***

Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide ***clearer visibility of the proposed WTGs across an approximate 10-dearee arc of view.*** *In these views there would be a degree of juxtaposition of the WTGs with the Abbey, but most of the array would be obscured by the Abbey itself, which would remain the dominant element in these views.*

The ***WTGs would be visible from St. Columba's Shrine*** *(Figure 21). In this view, they would, however, be largely screened by the higher ground to the west and south-west of the Abbey and by lona Village;* ***in these views the WTGS would be seen*** *against a horizon broken by the intervening buildings and trees.*

A photomontage was captured from Cladh an Diseart (Figure 23) which may represent the site of a small chapel and bural site and contains a carved rock know as 'Columba's Table' at the request of HES. ***While some WTGs will be seen from this location, the dominant feature is the Abbey*** *due to its scale and prominence, and the nature of the view upwards towards the abbey, which emphasises its scale and solidity against the horizon. The WTGs would appear as back ground features…*

Views across St Oran's Chapel and between the Abbey complex and Martyr's Bay along and to the east of the Sraid nam Marbh (Street of the Dead) are illustrated in viewpoint CH7 (Figure 10). ***This viewpoint offers possibly the clearest visibility of the WTGs from within the scheduled area, and the WTGs would appear in an approximate 12 degree arc of view.***

The WTGs would appear as background features in general views along lona sound and more generally out to sea, *a view which is already* ***disrupted by lona village****, the ferry and associated harbour works.* (Note: The use of the applicant's word 'disrupted' in relation to intrinsically integrated elements of the Iona experience, the village, is entirely inappropriate. The rotating turbines will disrupt the long held view, what will not disrupt the view are those elements that make up the experience of that established view.*)*

The applicant is unequivocal, the setting of specific listed monuments on Iona will change,
By their own statements, the proposed development fails NFP4 Policy 7 (Historic Assets and Places) because it explicitly dictates that development proposals affecting scheduled monuments will **only be supported** where direct adverse impacts on the monument are avoided, and "significant adverse impacts on the integrity of setting of a scheduled monument are avoided".

8. SEA SETTING OF IONA

HES raise a bigger question though and that is, it is not only the visual effect of the turbines on the listed monuments but the whole setting of Iona which is at stake within which the listed monuments sit. They say (9/01/25) that there is concern for those monuments;

> *'In particular, those that are early Christian and that often depend on a sense of place and isolation derived from being set on the edges of landforms and a relationship with the wide open sea. At this early stage, it is not possible to establish whether the severity of these impacts would likely raise issues of national importance such that we might object. The EIA Report should fully assess these, including wireframes and/or photomontages, where appropriate.'*

In other words the EIAR (based on the handbook advice) in addition to visualisations, should therefore seriously review the '*knowledge*' of the Christian origins of the setting and the relationship of the coastal edge and sea in its making, not just the physical visual reality. At the same time the EIA report should explore the ***'experience'*** of that setting in particular its 'sense of place' and 'isolation' both then and now.

They continue:

> *'Particular attention should be given to monuments that have a known visual relationship with the sea that contributes substantively to their cultural significance and where changes as a result of the proposed development might result in significant effects.*
>
> *'Without prejudging future assessment, it is likely to be those sites that contain components of monastic or early Christian occupation that have the greatest potential for a significant adverse impact on their settings. Some cluster around fertile land and sheltered bays and are often associated with earlier high-status farmsteads such as mediaeval sites where Christianity was promoted by the elite, for example Nave Island, monastic site, Viking house, chapel, burial ground, settlement and kelp-burning kiln (SM3233). Others are in more isolated locations and occasionally inserted into the remains of brochs and other Iron Age sites. The most evocative, often those ascribed with the most spiritual associations by modern communities, exploit an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat, a place physically and visually cut off from the rest of the world.*
>
> *'Their sense of place derives from being 'on-the-edge, exposure to the sea and a level of perceived wildness. A large number of turbines present within outward views of the sea from these sites is likely to represent a significant alteration to their settings.'*

HES are clear in the case of Iona that the '*knowledge*' of the origins of Iona's development as a Christian settlement, accessed and built from the sea and lived as a Christian settlement on the sea is fundamental to its understanding.

But HES seeks to bring that history up to date, by saying that not only the '*knowledge*' of that locational choice but also the '*experience*' of that sense of detachment from the rest of the world

was a conscious act of their religious leadership. That the feeling of being alone at the limits of the then settled world tested the communities collective resolve and faith. To this end the sea horizon and wildness (and one imagines days of calm) where the weather met the land are crucial in that mix of creating for want of better words an ambience or atmosphere that supported the celebration of their beliefs.

But HES do not limit their assessment to long gone history, they associate it with our ***'experience'*** now as modern communities and the importance for those communities captured in the idea of being spiritually exposed to '*an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat,'*

In HES's view the '*knowledge*' of that essence of Iona's location and setting which was shaped historically, still has significant value today.

It is accepted that it is hard for us with all the benefits of modern life to imagine living on this precarious edge, but we are fortunate to have written evidence of what it was like.

There has been a remarkable literary survivor of that age that informs us of the issues addressed by HES. The 9th Abbott of Iona, Adomnan (d 704AD) wrote three books on the 'Life of Saint Columba' that document the conditions they lived under and the inextricable connection between land and sea. A word of caution for modern readers, each book is a series of 'parables' and we have to be careful in this context not to bring our modern perceptions to a world where you didn't know the next day's weather, what the seasons might bring, whether crops would grow what neighbouring communities might be thinking and doing. In that chaos, stability was found in the hope of a divine guide hence the style of Adomnan's book. A selection of quotes from his book shows the inextricable link between the island and the sea.

> *Book 1 Chapter 4*
> *'Once in Iona, one day of crashing storm and exceptionally high waves…..the boat for which the brethren were waiting arrived as the saint foretold……..by God's gift a marvellous line kept them apart, so that they had not felt the storm though, they said they could see it far off'.*
>
> *1/19*
> *'My son, you must be very careful today. Do not try to go directly across the open sea to Tiree, but instead take the roundabout route by the Treshnish Islands. Otherwise you may be terrified by a monster (whale) of the deep and find yourself scarcely able to escape'*
>
> *2/12*
> *'Once, when St Columba was at sea, he found himself threatened by danger. A great storm, with gusts of wind blowing from all sides, arose and his boat was tossed and buffeted by great waves.'*
>
> *2/13*
> *'On another occasion St Columba's companions called on him during a wild and dangerous storm that he should pray to the Lord for them.'*

But how should we understand the sea in relation to Iona? We will now consider that.

9. IONA AS AN ISLAND

A comment from the applicant in Appendix 14.3 underlines a disconnect regarding the relationship between the island of Iona, its historic monuments, and its maritime landscape. The historic assets and the surrounding sea are inextricably linked. The applicant states:

> *'Views towards Iona and across the Sound of Iona on the ferry journey from Fionnphort would again be minimally affected as demonstrated by Figure 20.* ***In this view a greater proportion of the WTGs would be visible, however, there would be a 130-degree arc of separation between the nearest WTG and the Abbey*** *(Figure 20b and Figure 20c). During the ferry crossing to Iona the viewers attention in these views is generally toward the Abbey as the focal point of the pilgrimage,* ***and the view out into the ocean is read by the viewer as a different space to that occupied by the Abbey.'***

In essence, the applicant argues that because the windfarm and the Abbey sit 130 degrees apart, a visitor can simply look toward the Abbey and ignore the development. This logic assumes that human perception can artificially compartmentalise the landscape, treating the ocean and the island as entirely separate, unrelated spaces rather than a single, unified historic environment.

In Planning terms the island is seen as a whole, a statutory APQ - An Area of Panoramic Quality - but looking back in history it has been seen as a whole entity. Richard Sharpe the translator of Adomnan's 'Life of Saint Columba', says '*The role in which St Columba seems particularly a Scottish saint is as the missionary who converted the Picts north of the mountains. This is the part that Bede gave him'.* He goes on to quote Bede (d 735AD and seen as the 'Father of English History):

> *A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. … Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon; he converted that people to the faith of Christ by his preaching and example,* ***and received from them the island of Iona on which to found a monastery.*** *(Bede, III 4)*

From the very beginning the monastery and island were seen as one. Richard Sharpe confirms this 'whole' island Abbey view when he writes:

> '*Adomnán several times speaks of Iona as '****our island'*** *and once as '****this our principal island'*** *(I 1). It is clear that in his own day, when the saint was invoked to bring an end to the drought (II 44), the cultivation of the island was in the hands of the monastery. His stories of the monks' working in the fields at the machair suggest that he believed this was so in Columba's time. The monastery itself was situated on the east side of the island, looking out across the Sound to the Ross of Mull. There is no doubt that it was on the*

raised beach of cultivable land where the abbey stands today.'

We are fortunate to have Adomnan's record for he confirms the sense that the island land was worked for the benefit of the monastery:

1/37
….For once the brethren were returning to the monastery after a day's work on the harvest. They had reached the place called Cúl Eilne, which is reckoned to be the halfway point between the machair on the west side of Iona and our monastery……

2/28
One day of early summer, shortly before he passed to the Lord, St Columba went by cart to visit those brethren at work building a stone wall around the machair on the west coast of Iona.

3/16
Likewise, on another occasion, when St Columba was living in Iona, he addressed the assembled brethren, making his point with great emphasis, saying;
"Today I shall go to the machair on the west coast of ***our island****, and I wish to go alone.*

No one is to follow me therefore. They obeyed and he set out alone as he desired. But one of the brethren, who was an artful scout, took a different route and hid himself on the top of a little hill that overlooks the machair, for he was eager to find out why the saint had gone out alone. From his vantage point, he could see St Columba standing on a knoll among the fields and praying with his arms spread out towards heaven and his eyes gazing upwards.

The applicant in his Appendix 14.3 takes a much narrower perspective for their assessment essentially the listed precincts, except that they widen it to include the route as experienced from Fionnphort. What we have seen is that a broader view **is required,** but for the whole island. That the historical research and consequent imaging of the Machair Wind Farm need to be investigated island wide, not just the limited zone identified.

10. DALRIADA AND THE LINK TO THE NORTHERN IRELAND

The understanding of role of the sea is important to HES for other reasons, and this comes up again in HES guidance to the applicant specifically with reference to St Mary's Abbey;

St Mary's Abbey, Iona, monastic settlement (SM12968) comprises the remains of the large early historic monastic settlement founded by St Columba in AD 563, now occupied by restored medieval buildings associated with the Benedictine Abbey of St Mary founded around AD 1200. It is the birthplace of Scottish Christianity and internationally renowned for its surroundings and spiritual associations. It was easily reached by Columba and his followers from Ireland by sea and sits at the crux in linking Ireland with western Scotland. Although exploiting a sense of remoteness, its coastal location resembles that of many other monastic sites at a time when the sea would have been the main communication

route allowing movement around a network of monastic communities. Its setting includes characteristics of that isolation, its relationship to the sea and the links across to Ireland but also extends to encompass the rest of the island and the complex of other sites across it which are associated with St Columba and the monastery's later history. Key outward views from the monastery include those looking towards Ireland, reciprocal views along the Street of the Dead, views and other associated links between the abbey, nunnery, Martyr's Bay and many other related chapels, crosses and other sites across the island. The links between this interrelated group of sites combine to create Iona's setting, and all include a relationship along the coast and out across the sea.

HES thus reassert the importance of the sea and the sense of isolation it engenders in relation specifically to the Abbey. That isolation is not a statement of being lost to the world. The sea was the navigation channel of the islands and most importantly the connection to Ireland, Saint Columba's and subsequent brethren's roots. Adomnan asserts that very clearly in his 'Life of Saint Columba':

1/12
"…My dear sons, why do you gossip idly about these kings? For both of those you mention were recently killed by their enemies, and their heads cut off. Sailors will arrive today from Ireland and tell you this.'…

1/18
…..This man will accompany you for the few days you are travelling in Ireland, and when you return to us here, he will come with you. God has chosen him, and he will live out life here in my monastery.'…

2/14
Once, the same St Cainnech forgot to take his staff with him when he set sail from the harbour of Iona on his way to Ireland…

2/39
Once, during the period when St Columba lived in Iona, a layman who had only lately assumed the clerical habit crossed by sea from Ireland to the blessed man's island monastery.

Ireland and particularly the north was not only Saint Columba's base but also the anchoring civilisation of the west coast archipelago of Dalriada and the sea was the connective 'tissue' that bound it together and it is in that context that HES write in their initial comments that 'I*t is possible that the proposed turbines may be visible within these views and could diminish Iona's sense of isolation and its relationship with the sea.'*

The concern for this well-established historically, connection between Iona and Ireland is repeatedly raised in further commentary from HES. Their recorded Preliminary Screening comments HES (28/04/25) state on the basis of early wireline drawings that:

'The proposed development would be likely to result in a substantial alteration to the baseline setting of the monument as the sense of place and views across the sea towards

Ireland would be compromised. It is not possible to establish from the wireline alone whether the severity of this impact would likely raise issues of national importance such that we would object.'

And then again HES (12/12/25) reiterate to the applicant:

'HES confirmed that at present all sites are experienced from land and connectivity is done through land, however for these sites, specifically those which reference Northen Ireland, the sea should be considered as the highway of connectivity between all sites, the Applicant should be assessing what the seascape means in relation to monastic components.'

11. THE 'WHOLE ISLAND' APPROACH

If we take the 'whole island' approach then the impact of the southerly stretch of industrial turbines is seen as it will be perceived, not as a narrowly framed sequence of views around the Abbey but an expansive stretch across the southern horizon. Just as the island was experienced in Saint Columba's time, so it is today with visitors and pilgrims reaching all parts across the island. Saint Columba's bay is in the south a very popular destination and it is there and from the surrounding hills which are well walked that the clear southern aspect towards Ireland will be most mentally obstructed by the phalanx of turbines in the sea.

The applicant writes:

'Tor an Aba also affords views in an arc from north through east to southwest, including a view down the channel in the general direction of Ireland and into the open sea beyond. There is no visibility of Ireland, which reflects the possibly apocryphal story that Columba chose lona as the first landfall out of sight of Ireland, giving a sense of a view back towards a past that was once but is no more. In this sense there is no direct sightline, but the sense of another place beyond the horizon becomes significant.'

The EIA handbook recommended to be used by HES and which the applicant has said they have used identifies *'knowledge'* of a setting *as a* prerequisite of an assessment. The idea that Columba is inferred to believe he was leaving a past is a nonsensical reading of that historical knowledge. It would be as ridiculous as saying that in a commute from Edinburgh to Glasgow, each time I leave my past behind.

The source of the 'apocryphal' story does not bear up with historical evidence. If as the greatest historian of that age 'The Bede' in his history stated;

'*A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. ... Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon;* ***he converted that people to the faith of Christ by his preaching and example, and received from them the island of lona on which to found a***

monastery. *(Bede, III 4)*

Britain at that time was a highly politicised society not in our democratic terms, but a society in which 'biblical law' was being adopted across the land. Columba's landing was not a 'Columbus discovery of America moment', that is an historical mash up completely at odds with the records. According to the most reliable scholar of his time, Columba was ‘given’ Iona, he did not ‘choose’ it. The sequence of Columba's to and froing in this political sphere is known only in fragments but in no way supports such an historical understanding.

The applicant’s impact assessment underestimates the historical connections between Saint Columba and Ireland, creating an incomplete picture of both past and present cultural 'experience' as defined by the EIA handbook. Historical records, such as Adomnan's accounts, demonstrate that the sea between Ireland and the islands functioned as a dynamic, bidirectional 'highway of activity' (HES 12/12/25).

> *2/45*
> *On the first of these, pine trees and oaks had been felled and dragged overland. Some were to be used in the making of a longship, and besides ships' timbers there were also beams for a great house to be brought here to Iona…*
>
> *The second time was several years later. Again, oak trees were being towed by a group of twelve curraghs from the mouth of the River Shiel to be used here in repairs to the monastery…*

12. THE BIG PICTURE

Amongst the concluding comments of Appendix 14.3 the applicant states erroneously:

> *While the WTGs would be visible on the horizon in views back towards Ireland, as* ***Ireland cannot be seen from Iona,*** *this view is a symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified.*

Geographically Ireland **can be seen** from Iona, from the top of Dun 1. But Dun 1 is important in much broader ways. HES allude to that.

HES is recorded to have advised as follows (20/02/26):

> *Wider views across the island can be obtained from the summit of Dùn I; these contribute greatly to an appreciation of the monument's sense of place, as well as communicating more specific aspects such as the monument's relationship with Columba's Bay in the south of the island.*

HES confirms a 'whole island' perspective be taken, that the island mental map is founded on a sense of St Columba's presence hence their citing of the view towards Columba's Bay.

There is evidence of St Columba climbing Dun 1 in Adomnan's 'Life of St Columba':

> *1/30*
> *Once the saint was sitting at the top of the hill that overlooks our monastery from a little distance, when he turned to his servant Diarmait and said:*
>
> *I wonder why it is taking so long for a ship coming from Ireland to get here. It brings a very learned man who has fallen into wrongdoing but will soon come here to perform a fearful penance.'*

The connection back to Ireland re-emerges. And it does again in another passage, in the context of St Columba regularly climbing Dun 1, which can be inferred from the following historical record:

> *2/4*
> *Once again while St Columba was living in Iona, as he sat on the low hill of Dùn Las he saw a heavy storm-cloud to the north rising from the sea on a clear day. Watching as the cloud rose, Columba turned to one of his monks sitting beside him, a man called Silnán mac Nemaidon, whose people were the moccu Sogin, and said:*
>
> > *"This cloud will bring great harm to people and livestock, Today it will pass over here and tonight it will shed a deadly rain over that part of Ireland between the River Delvin and Dublin,…*

In all likelihood Dun 1' was a regularly used high point of Columba's 'whole' island platform for teaching and preaching. Columba's teaching platform can be nicely understood by using HES's reference to (12/12/25) the beehive cell concept of understanding a setting (point corrected to make sense).

> *'HES provided an example of the **beehive cell** component and the importance of (not) ignoring the land behind and looking more at liminality of the site and highlighted that this component has not come through in the setting assessment so far.'*

That is you cannot understand the bees and their hive detached from the eco system that supports them. So similarly, Iona cannot be understood without understanding Columba and his 'whole' island, and as HES state the 'contemporary' communities that live 'happily' with that legacy.

13. THE DALRIADAN ARCHIPELAGO

That Columban eco system is much wider however than the island and the immediate sea that surrounds it. It would be quite within reason and normal to imagine Columba climbing Dun 1 with his fellow brethren, to a high point for a physical connection to 'his Lord above' and to the 360-degree expanse of their Christian Mission. The sense of the archipelago he served is captured in Adomnan's texts:

1/12
Once when he was travelling through the rough and rocky district of Ardnamurchan…

2/11
Once, when St Columba spent some time in the land of the Picts…

2/14
Cainnech had reached the southern part of Islay…..

2/15
So it happened that on one and the same day two men, parting from one another in peace, travelled under full sail with a following wind - Baithene in the morning to Tiree, Colmán after noon beginning his voyage to Ireland.

2/22
Just as the saint had said, it brought a great squall of wind, which, finding the robber and his loot in the open sea between Mull and Coll, at once stirred up the waves and sank their boat.

2/24
Once, when St Columba was living in the island of Hinba,…

2/41
Once when St Columba stayed as a guest in Rathlin Island,…

Adomnan's text reveals that archipelago as an interconnected 360-degree world of open horizons with seaborne activity, trade, transportation as well as fishing and hunting. There is no doubt that this bustle of activity would have been under constant observation from the island high point.

It is that 360 degree panorama that the vast wind farm will occupy a large proportion of that view. It will add nothing to the legacy of 1500 years of history of the Christian settlement of Iona, its Abbey and Precincts, the island setting, its sea surrounding it and the horizons of the archipelago of islands.

The Machair Windfarm will, from the point of departure to Iona from Fionnphort, be a presence in the 'new experience' of the island of Iona. Where now eyes conceptualise Iona as a 'whole' in its open setting, in the future there will be this new pervading presence of turning turbines across miles of the southerly horizon.

The EIAR infers that the presence of the windfarm can be mentally compartmentalised 'out' and implies ways of doing it:

- Walk towards the Abbey but do not look back.
- Use a soft-focus effect to bring the foreground into sharp relief, letting the background blur into obscurity.
- Mentally chop out the wedges of vistas that reveal the windfarm.

But '*experience*' is not like that. Lived experience is a dynamic constantly evolving moving photo or like a film of looking, turning and absorbing, whilst applying your '*knowledge'* to understand what you are seeing. The 91 turbines cannot simply be compartmentalised and erased.

14. ALTERNATIVE SITE SELECTION

Consider the case of the turbine development sited, for instance, west of the island beyond the Skerryvore Lighthouse at a distance similar to the offshore wind farms on Scotland's east coast.

This is an important scenario because the issue is not the idea of a **remote** windfarm at sea. Most people don't have a problem with that - subject to safeguarding of wildlife and seabed. The issue is the location of the Machair windfarm so close inshore with all the consequential adverse impacts on the neighbouring islands that the **proximity** brings.

In this alternative location for the turbine development, upon arriving in Fionnphort, you would see Iona perfectly framed by its southern, eastern, and northern waters, surrounded by its archipelago. The unobstructed, empty horizon looking towards Ireland would remain untouched. In this scenario, you would only spot the wind turbines when traveling directly out to the development, or from the far west coast of Iona.

In this alternative location, the turbines' looming, dominance over Iona's seascape would disappear into the Atlantic horizon. The important historical south horizon of Ireland, Colonsay, Islay and Jura would remain unaltered as would the northern horizon of Tiree, Coll, Ulva, the Treshnish Isles and Staffa.

So why would this alternative site selection not be a logical solution?

It would appear, as the Planning Statement states in 2.2,(22) in its *'Refinements to the Wind Development Area',* that a key criteria is *to 'avoid water depths greater than 60m.'*

The application document *'Chapter 4 Site Selection and Alternatives'* states that:

> *The W1 POA is also one of the few ScotWind POAs that is suitable for fixed-bottom turbine foundation technology. Such foundation technology has been proven to be technically viable at scale in the UK and worldwide, with all major commercial offshore windfarms in UK waters (including East Anglia ONE, TWO and THREE which were developed by ScottishPower Renewables (SPR)) using such technology.* ***This is in comparison to the majority of other ScotWind POAs, which are located in deeper waters than the W1 POA and therefore depend on floating turbine foundation…***

However, contrary to the above assertion, SPR have in fact submitted a Section 36 Planning Application to the Marine Directorate for a 3GW offshore floating turbine development called MarramWind. It is therefore well within the capability of SPR to locate the Machair Windfarm remote from Iona and SPR cannot claim they are technically restricted by the 60m depth limit for fixed seabed turbine to locate it in such close proximity to Iona.

Therefore, these adverse impacts which are fully acknowledged by the applicant, and caused by the selected site being so proximate to Iona, do not need to be accepted and '*outweighed by the social, environmental and economic benefits of national importance'* of the development as the applicant claims because it is feasible for the development to be built further offshore using floating technology.

Furthermore, there is entirely no need for any adverse impacts on Iona from a turbine development because it is not technically necessary for it to be in this location.

15. THE IMPORTANCE OF IONA TO THE WESTERN WORLD

The applicant repeatedly cites 'the national importance' of their proposed development. That has to be seen in the context of '**the importance of Iona to the Western world.'**

As Professor Jonathan Burnside, Professor of Biblical Law, University of Bristol Law School, states:

> *As the doyen of art and cultural history, Kenneth Clark, explained in his seminal work, Civilisation, European civilisation survived the collapse of the Roman Empire by the copying of books. Iona was one of only two or three places in the British Isles which provided, for a short time, a modicum of security for this great task. As is well known, Iona was founded by St. Columba, who came from Ireland in the 563 AD. But Iona was considered a sacred place even before he arrived. For four centuries it was the cradle of Celtic Christianity, with the island bearing witness, it is said, to as many as 360 large stone crosses. Clark describes the extremely sophisticated and refined "pages of pure ornament" produced by the Celtic scribes as "almost the richest and most complicated pieces of abstract decoration ever produced..."* ***Thanks to the faith and works of the scribes of Iona, European civilisation got through by the skin of its teeth. The "clear, round lettering" which came from their hands "carried the word of God all over the Western world.***

16. REFLECTION ON POLICY CONTEXT

Looking back at the relevant policies and assessing their criteria:

Policy HEP4 which explicitly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

> *'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.*
>
> *'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.'*

The application whilst fully acknowledging that the Machair Windfarm will adversely impact the heritage asset of Iona Abbey and its island context, fails to enhance the assets, fails to minimise the impact because the only way to minimise the adverse impact would be to build the Machair Windfarm on a site more remote to Iona than the application site.

National Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development proposals affecting scheduled monuments will only be supported where:

i. ***direct impacts*** *on the* ***scheduled monument*** *are avoided;*
ii. ***significant adverse impacts*** *on the integrity of the* ***setting of a scheduled monument*** *are avoided; or*
iii. *exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

The application's direct and significant adverse impacts are fully acknowledged in the application documents and are not avoided. No exceptional circumstances have been demonstrated to justify the adverse impact on the heritage assets or their settings which could be avoided by building the Machair Windfarm on a site remote to Iona.

Scotland's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23 *Designated heritage assets* – representing sites of national or international significance for which statutory requirements apply.

> *'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'*

The designated assets' setting, which protects the heritage assets, has not been protected by the very proximity of the selected site to Iona. Building Machair Windfarm on this particular site is not necessary when it could be constructed on a more remote location.

17. EIA SCORING

It is hard to reconcile some of the scores attributed in the EIAR assessment had a deeper analysis '*knowledge*' of Iona as a setting and a subtle place of '*experience'* been carried out. The above has clearly shown that the examination of Iona's importance by the applicant is wanting, and as a result provides an inadequate basis to carry out a proper assessment. In the technical summary of the whole submission it states under 7.9 (180):

> 1. ***There will be no physical impacts to designated terrestrial heritage assets identified in the assessment. However, it is recognised that during operation of the Project, changes to the setting of these designated heritage assets will occur due to the presence of the WTGs in the seascape resulting in moderate to major changes (significant in EIA terms) to the following designated heritage assets for the WDA alone***

and combined with the Offshore ECC and onshore transmission assets, based on available information:

- *Dubh Artach Lighthouse (Listed Building);*
- *Oronsay Priory and Cross (Scheduled Monument);*
- *Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);*
- *Dun Bheolain, fort, Islay (Scheduled Monument);*
- ***St Mary's Abbey, Iona, monastic settlement (Scheduled Monument);***
- ***Iona Abbey (Listed Building); and***
- ***Iona (Conservation Area)***

The statement that there are "no physical impacts to designated terrestrial heritage assets" relies on a narrow definition of harm that contradicts Scottish planning frameworks. In Scotland, an asset does not need to suffer physical destruction to experience harm; impacts on its setting and cultural context are equally significant. While the physical structures on Iona remain untouched, the setting of these heritage assets will be substantially impacted.

The applicant acknowledges that moderate to major changes will take place, yet relies on the application of English legal principles to justify these impacts within a Scottish jurisdiction.

What follows is the applicant's list of affected designated assets. The table fails to reflect the true historical significance of the Iona assets, which are relegated to the bottom despite being foundational to Western cultural development across Scotland, Britain, and Europe. Just as Stonehenge would rarely be positioned last in such a context, Iona's paramount importance in the historical narrative demands greater, and appropriate, recognition.

The applicant's list is fundamentally disrespectful. It appears to be based on a *'quantifiable'* criterion (applicant's terminology) - distance from the development. If the historical and 'cultural' examination had been carried out thoroughly with that '*knowledge and experience'* (as per the HES EIA handbook) of the designated settings and the island 'as a whole' rather than as a compartmentalised citation, the EIAR technical summary might more appropriately have stated:

1a
Changes to the setting of designated heritage assets, and their context, of National, British, Irish and European importance.

- **St Mary's Abbey (Scheduled Monument), Iona Abbey (Listed Building), Iona (Conservation Area) and the island of Iona as a monastic settlement.**

1b
Changes to the setting of designated heritage assets, and their context, of National importance.

- Dubh Artach Lighthouse (Listed Building);
- Oronsay Priory and Cross (Scheduled Monument);
- Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);
- Dun Bheolain, fort, Islay (Scheduled Monument);

By contrast, the applicant has dedicated just one paragraph, Paragraph 180, in the technical summary to the heritage assets, and their context, of Iona. In doing so, the applicant has failed to acknowledge the fundamental importance of Iona and its heritage assets to Western culture.

Furthermore, the Iona Abbey and its context is entirely underplayed in a startling statement from the applicant's EIAR:

> *6.2.1 Iona Abbey (L12310)*
> *In terms of the effects on the Category A listed building Iona Abbey (LB12310), these are assessed the same as the corresponding SM (see Section 1.6.1.5), while the* ***Abbey church*** *would remain the dominant element in all views of the asset and would very much retain its imposing physical and spiritual presence in the asset group, the juxtaposition of turbines with the asset* ***would detract to a degree.*** *Therefore, the magnitude of change is assessed as low adverse, resulting in a moderate adverse significance of effect, which is significant in EIA terms.*

Throughout the EIAR the applicant states that the turbine arrays will be visible and provides evidence of this visibility by way of imagery in the Appendix 16.4 (SLVIA) and Chapter 14.3 Settings Assessment, Appendix 14.3. Given the historic significance of the setting, they state that the turbine development would **detract** but **'to a degree',** inferring that the 'degree' is minimal – an incorrect conclusion that is repeated throughout the documentation.
By contrast, all the applicant's submitted images demonstrate an all-pervading presence of the turbine development. To state that they 'detract to a degree' thereby inferring that 'degree is minimal, is not accurate. These static photo images of the turbines do not convey what the eye will see in reality. The eye sees objects in much greater detail than these images portray and therefore in reality, the wind turbines will appear much more visible that as portrayed (some of the turbines are even blurred in the imagery). Furthermore, these images do not convey the reality that these turbines will be constantly mechanically moving – further highlighting the physical intrusion on a currently empty horizon.

Setting aside, for a moment, the paucity of the historical examination of the applicant's EIAR, the *Matrix For Evaluating The Significance Of An Effect* Table 5.1 (pt 77 of the Technical Summary) indicates ***'low adverse'*** change by the development on Iona heritage assets which is inaccurate and we challenge that assessment. Photographs in the EIAR are a useful measure of the extent of visual impact - albeit they are not in a worst case scenario because in some of the imagery, the turbines are blurred whereas in reality they may be seen with crystal clarity.

The EIAR in juxtaposed foreground/ background views, deems and interprets the historical asset, the Abbey, as diverting a viewer's attention away from the backdrop of the turbine development such that the adverse impact will not be noticeable. However, HES states that it is necessary to take into account '*knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or similar places – life experience'* and in the case of the Abbey and the Island of Iona, that is the knowledge that the place is an ancient spiritual place founded by St Columba, the birthplace of Christianity in Scotland, set in splendid isolation against empty horizons. With that 'knowledge,' the perceived adverse impact on the Abbey and Iona wrought by the occupation of a vast industrial development, constantly in

motion, on those empty but resplendent horizons **will in fact be intensified.** Therefore, in this context, **the adverse impact is** not 'low' but **'high'.**

A comparative analysis of heritage settings demonstrates this principle. Consider a theoretical scenario involving a proposed wind energy development situated 12 miles from a monument of immense historical importance, such as Stonehenge. The juxtaposition of this ancient Neolithic monument with a vast array of modern industrial infrastructure would create a severe visual clash.

Because cultural context profoundly influences visual perception, the introduction of industrial-scale development within the setting of an anchoring national monument would result in an unacceptable adverse visual impact. Therefore, assigning a "low" visual significance score to such a proposal would fail to recognise the fundamental incompatibility between modern utility structures and iconic heritage assets.

Likewise, the Abbey and its setting of Iona are of National, British and European significance and enjoy worldwide interest. So here we would have another pre-industrial setting of huge significance (Iona an anchoring monument of Britain's and the national historical timeline as with Stonehenge) set against a modern utility seen as a horizon of dynamic steel turbines. Therefore the applicant's adverse magnitude score for just the scheduled Monument, Iona Abbey and Iona Conservation Area in their *Matrix For Evaluating The Significance Of An Effect* Table 5.1 of 'low adverse magnitude' is irrational.
We believe that the EIAR should include an assessment of the **whole of Iona as well as the scheduled Monument, Iona Abbey and Iona Conservation Area.** Given the National, British and European historical and cultural importance of Iona and its Abbey we believe that such an assessment is reasonable and appropriate and that the adverse magnitude score is likely to be a **'high adverse magnitude'.**

Put it the other way, if Iona Community Council had been carrying out the EIAR, with our deep 'knowledge' we would have started with an adverse magnitude score of 'high adverse impact'. So, what would bring that score down to a 'low adverse impact' when it is, as HES state, *'knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or similar places – life experience'* that affect the perceived adverse impact? Nothing can bring that score down.

The adverse magnitude score for *Matrix For Evaluating The Significance Of An Effect* Table 5.1 is very important. A 'low adverse impact' taken together with a 'high' sensitivity results in a 'moderate' significance of effect (technical summary 77. Table 5.1) which allows the applicant to state in that point of the summary that ***'...in general, effects which are of major or moderate significance are considered to be significant in EIA terms, although it is possible that a conclusion of moderate effect significance may not be considered significant'.***

Simply assessing the adverse magnitude score as 'medium adverse impact' in Table 5.1 makes the significance of effect 'major,' in which case there is **no opportunity to change the significance of effect.**

If, as we believe, the adverse magnitude score in Table 5.1 was **'high adverse impact' makes the significance of effect 'major' and there is no opportunity to change the significance of effect.**

What this means is that by carrying out an inadequate assessment which fails to assess the whole of Iona and additionally fails to correctly assess the scheduled Monument, Iona Abbey and Iona Conservation Area in accordance with HES, the applicant's EIAR underscores and then dilutes the significance of the adverse impact to the point where the irrational conclusion is in 1.6.2.3.5 (332-333):

> *The focus of the CA is St. Mary's Abbey and while the WTGs would be visible as a background element of views of it, it would remain the visually dominant focal point of views.*
>
> *The presence of the WTGs in the distant seascape would not detract from those aspects key outlined in Section 1.6.3.1.1 which contribute to its cultural significance.*
> *As a result, distant visibility of the WTGs, the change to setting would be of* ***low adverse magnitude*** *which for an asset of high importance* ***will give rise to a moderate adverse effect to cultural significance which would be significant in ElA terms.***

The significance of the heritage assets have been known about as far back as the ***2013 Strategic Environmental Assessment (SEA) of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters.***

In this 2013 document, under the site designation reference OWW1 (roughly equating with the current Machair Windfarm) it identified under Historic Environment, Impact on Setting of Historic Environment as being of a ***medium risk.***

Indeed that report thought it important to specifically highlight two historic settings: Skerryvore Light House, Tiree and Iona Abbey:

> *6.7.47 The region contains features of historic interest, including designated coastal sites such as Skerryvore Lighthouse in Tiree and* ***Iona Abbey.***

In the summary of SEA recommendations, it advised under Table 6.4: Assessment of the Plans against SEA Objectives:

> ***To avoid adverse effects on the character and setting of historic sites and buildings***.

More specifically on this point, SEA recommendations stated:

> *It identified* ***historic features to avoid at the project level,*** *recommending the* ***avoidance of significant effects on key features of the historic environment in the siting of offshore developments.***

Summarising the documents position 7.2.6 on *Historic Environment*, concern for the heritage assets are amplified:

*However, there are also more generic effects relating to **potential impacts on the setting of historic features** and undesignated marine features, such as some wrecks. The following mitigation has therefore been identified.*

*Project level assessments should consider the **potential impacts on the setting of sites and seek to mitigate accordingly to minimise any such effects.***

SEA's 7.3 Regional Recommendations for Draft Plan Options, West 7.3.21, confirms the role of the EIA process in relation to the historic environment:

> 7.3.21 The region contains many designated coastal features of importance to the historic environment. **The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised.**

In 2013, thirteen years ago, it was clear that **Iona's heritage assets and their island context,** was a significant issue. It was clear in the SEA of 2013 that adverse impacts were to be avoided or minimised with specific reference to Iona Abbey and, by implication, its context.

Ultimately, the EIAR's conclusions underestimate the overall visual impact because the underlying assessment relies on a limited historical analysis and prioritizes static photomontages over the dynamic, lived reality of human visual perception in this landscape.

To suggest that placing towering industrial machinery in the backdrop of one of Western Europe's oldest and most sacred island landscapes will diminish Iona's cultural and spiritual significance only "to a degree" is a fallacy that fails both EIA standards and common sense.

The applicant's conclusions of a 'low adverse magnitude' ignores the relentless, industrial motion of massive offshore turbines that will irrefutably draw the eye and irrevocably alter the resplendent emptiness of the historic Atlantic horizon. To conclude in the applicant's *Matrix For Evaluating The Significance Of An Effect (Table 5.1)* that the significance of effect will be *'**moderate** adverse'* when no mitigation has been carried out is irrational.

The *2013 SEA of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters,* remains the primary advisory framework and yet the applicant has failed to address its stated concerns with regard to *the '**avoidance of significant effects on key features of the historic environment in the siting of offshore developments'*** and if any are found ***'to mitigate accordingly to minimise any such effects'.***

The 2013 SEA stated clearly that it was incumbent on the EIA for each project that the ***'The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised'.*** This resulting Machair Windfarm EIA has singularly failed to show how adverse effects have been avoided, minimised or in any way mitigated. The fact is, they can't be.

18. CONCLUSION

In conclusion, there is no mitigation that can lessen the wholly unnecessary adverse impacts on the heritage assets and their context, short of not building the development in this location.

The 20 or so page Appendix 14.3 response to HES questions on the '*knowledge*' of Iona's 1500-year history skims the surface of Iona's deep legacy to our Scottish culture given the thousands of pages in the submission. In the final Chapter 7 of the Planning Statement under 'Planning Balance and Conclusions', Jura is mentioned four times and Colonsay once. Iona is not mentioned at all.

There is a disconnect between the depth of known history of Iona and how it is sketchily summarised by the applicant and interpreted in the EIAR as summed up in final paragraph of the applicant text on the Iona Abbey setting, which is repeated here.

> *While the WTGs would be visible on the horizon in views back towards Ireland, as Ireland cannot be seen from Iona, this view is a **symbolic manifestation of connectivity** rather than a tangible or physical link that can be **quantified**.*

The EIAR on the Abbey ends with a trivialising of an entire cultural understanding of the root of Western Christianity on this coastline and a secular demand for quantifiable criteria, when in fact the EIA handbook clearly states that other factors, '*knowledge*' and '*experience*' need to be taken into account.

There is however one clearly quantifiable observation that can be drawn and which should be a significant factor in the determination of this planning application: amidst all the off-shore windfarms being built off Scotland;

There is only One Iona.

[Redacted]



To the applications made by Machair Wind Ltd for consent under Section 36 of the Electricity Act 1989 and for the associated Marine Licenses under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed Machair Wind Offshore Windfarm (Marine Directorate references 00012385/00012386).

Dear Marine Directorate,

Further to your email of 2nd September offering an extension of the submission deadline to 30th September which I was pleased to confirm acceptance of, please find attached my representation.

Thank you.

[Redacted]

[Redacted]



ONE IONA

PLANNING OBJECTION

TO

APPLICATION REF: 00012385/00012386

Planning Objection

To the applications made by MachairWind Ltd for consent under Section 36 of the Electricity Act 1989 and for the associated Marine Licenses under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed MachairWind Offshore Windfarm (Marine Directorate references 00012385/00012386).

[Redacted]

This planning application for a vast wind turbine development off the island of Iona exposes the profound gulf between a commercial energy sector driven by numbers and monetary valuation, and a local world rooted in deep-seated beliefs, history and nature.

It is no exaggeration to liken this clash to historical precedents where a powerful, modernising force, driven purely by financial motives, proved entirely indifferent to a distinct local culture. Parallel land planning dynamics can be seen in Imperial Britain's confiscation of clan lands in the Scottish Highlands during the 1700s, the westward expansion and reallocation of Indigenous land in America, and the systematic erosion of Aboriginal rights in Australia through '*terra nullius*', the colonial stance that the land belonged to no one before the arrival of European settlers.

Throughout the application documents, any attempt to bridge this divide and achieve mutual comprehension is entirely absent. Two incompatible languages are being spoken. On one side is a community that understands the irreplaceable value of this landscape, knowing the development could easily be built elsewhere. On the other side is a corporate entity viewing the area strictly as an economically viable engineering proposition. Ultimately, this conflict pits the globally renowned, uniquely cherished heritage of Iona and its neighbouring islands against just another offshore commercial development. This document seeks to capture the intangible essence of Iona and its broader context.

Through artistic reflection and factual evaluation, this work highlights vital aspects of the island's Columban origins that the original application overlooked. These elements are well-documented in ‘Life of Saint Columba’ by Adomnán (the ninth Abbot of Iona) and the monumental ‘Argyll, Volume 4, Iona’ by the Royal Commission on the Ancient and Historical Monuments of Scotland.Presented as an 'Artbook,' this objection builds on the identity of Iona as a crucible of artistic expression, famous for its Celtic Crosses and Illuminated Scripts—including what is arguably the world’s most valuable surviving document of that era, ‘The Book of Kells.’

This six-month creative journey in 2026 immediately followed a year-long study of the island’s geography, Christian origins as the Cradle of Christianity, and evolving modern history for an exhibition titled ‘Grit and Grace’ at Calgary Art Gallery. It came as a shock to imagine altering or endangering that legacy with a proposed wind farm. The application outlines a development occupying 448 square kilometres of sea, featuring 91 turbines—each the height of the Eiffel Tower—just thirteen miles off the coast of our neighbouring island, Iona.

Processing this issue was facilitated by an artist exchange between An Tobar on the Isle of Mull and An Fenten in Cornwall. Spanning roughly nine months, the exchange coincidentally overlapped with the official wind farm application in June 2026, which carried a strict deadline for public comment by mid-August.

1

Invitation Organised by CAMP, Creative Kernow Associates (CKA), and An Tobar and Mull Theatre. Overview:

We are inviting applications from artists based in Cornwall (including the Isles of Scilly) and on the Isle of Mull, Iona, and Ulva to take part in a new cross-regional artist exchange exploring creative practice in rural places.

This exchange will connect artists working in two geographically and culturally distinct, yet closely related, regions – both shaped by their landscapes, communities, seasonality, and relationship to tourism. The project offers space for artists to share ideas, develop new work, and build relationships across distance.

By means of a monthly series of digital meetings, the exchange enabled participating artists to develop their practice. In my case, it fuelled a project examining the public representation process, specifically focusing on the actual wind farm application and its inadequate understanding of the historical record and what it signified.

This Artbook forms a written and visual diary of that objection journey, responding to an ever-evolving series of events surrounding public interaction with the application. The following diary pages are broken into five sections:

- **April/May: IONA CONTEXT** – The juxtaposition of two parallel, disconnected worlds.
- **May/June: PROTEST PAINTING** – Recording the contrast between Iona's subtle, layered history and this vast offshore development.
- **June/July: PLANNING OBJECTION** – Documenting the first formal objection submitted to the Marine Directorate.
- **July/August: PUBLIC CONSULTATION** – Following the 'Road Trip' the painting undertook to draw public attention to the issue.
- **August/September: ONE IONA** – The creation of the objection diary and its submission to the Marine Directorate."

Iona Context

April

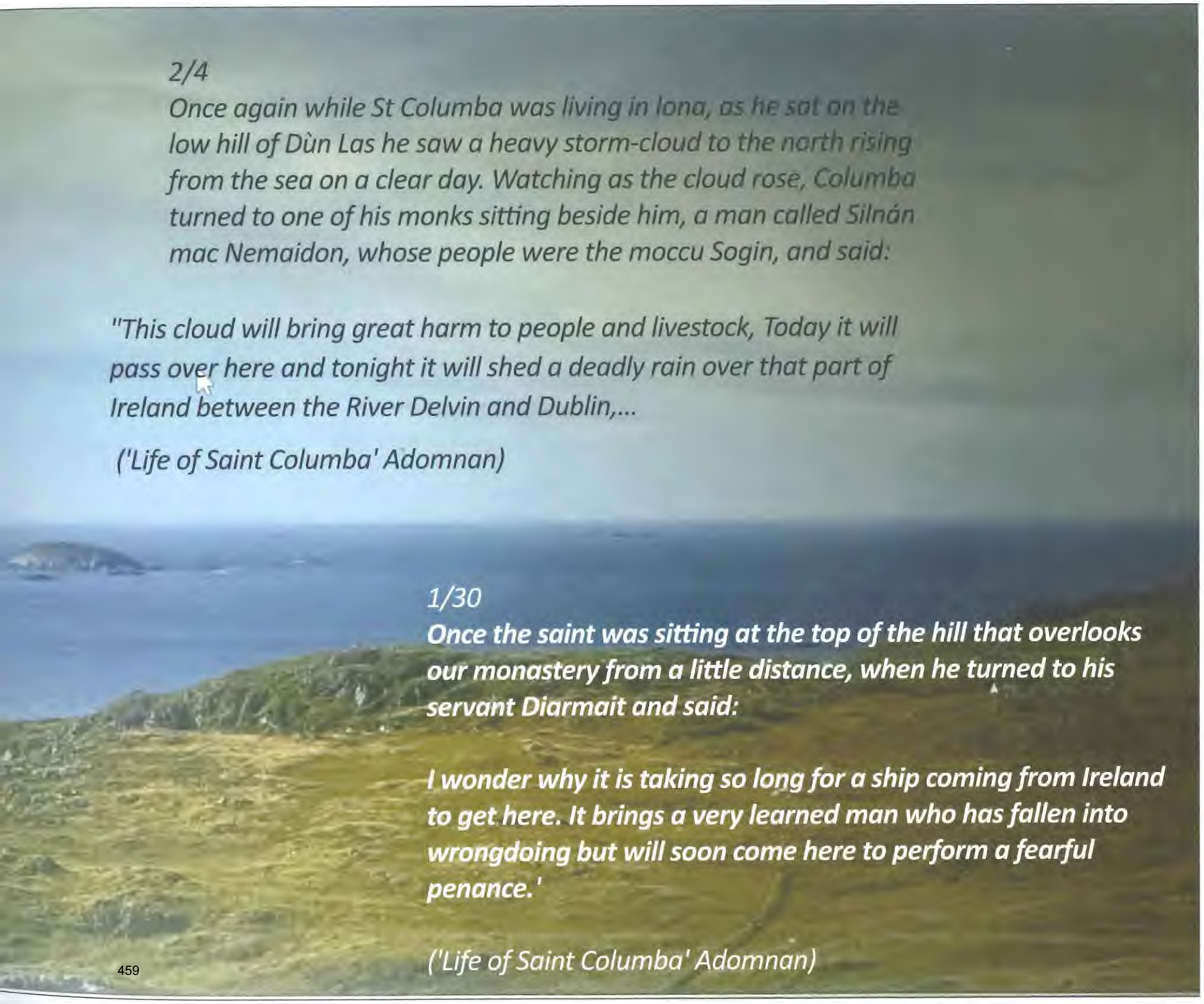

Mav

The view from Dun I in application

IONA ABBEY IS HERE



he Missing Jigsaw Piece - Iona Abbey



2/4

Once again while St Columba was living in Iona, as he sat on the low hill of Dùn Las he saw a heavy storm-cloud to the north rising from the sea on a clear day. Watching as the cloud rose, Columba turned to one of his monks sitting beside him, a man called Silnán mac Nemaidon, whose people were the moccu Sogin, and said:

"This cloud will bring great harm to people and livestock, Today it will pass over here and tonight it will shed a deadly rain over that part of Ireland between the River Delvin and Dublin,...

('Life of Saint Columba' Adomnan)

1/30

Once the saint was sitting at the top of the hill that overlooks our monastery from a little distance, when he turned to his servant Diarmait and said:

I wonder why it is taking so long for a ship coming from Ireland to get here. It brings a very learned man who has fallen into wrongdoing but will soon come here to perform a fearful penance.'

('Life of Saint Columba' Adomnan)


Grit and Grace, Iona


May Exhibition at Calgary Art G

ST COLUMBA'S BAY

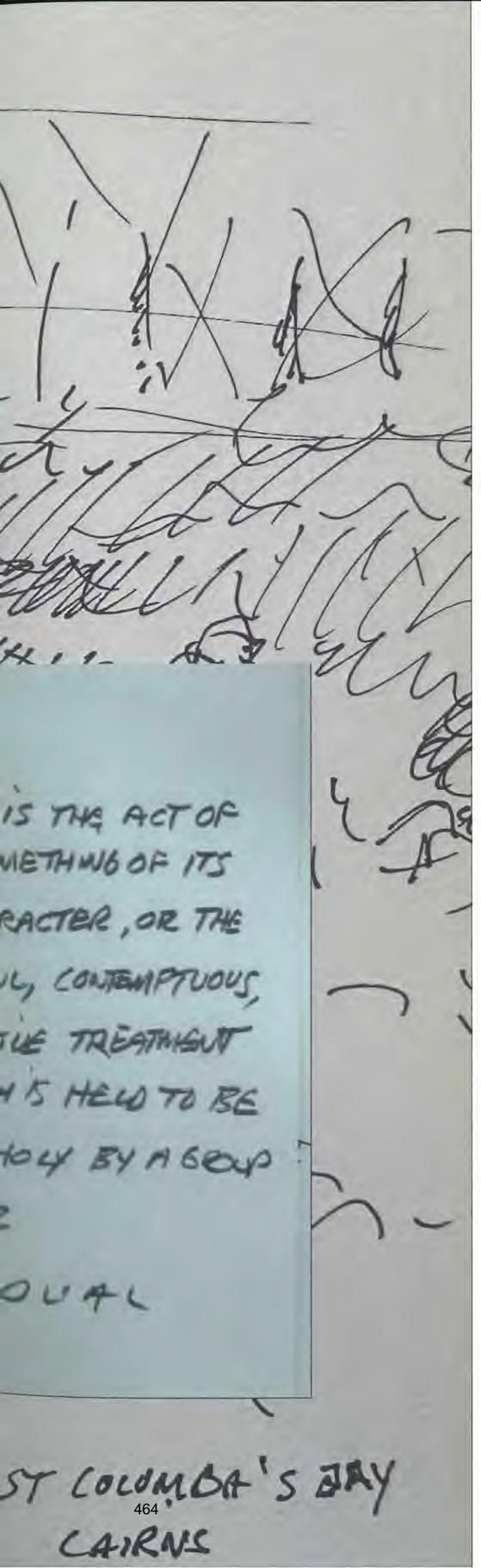
Wider views across the island can be obtained from the summit of Dùn I; these contribute greatly to an appreciation of the monument's sense of place, as well as communicating more specific aspects such as the monument's relationship with Columba's Bay in the south of the island.

(HES)



[Redacted]

[Redacted]

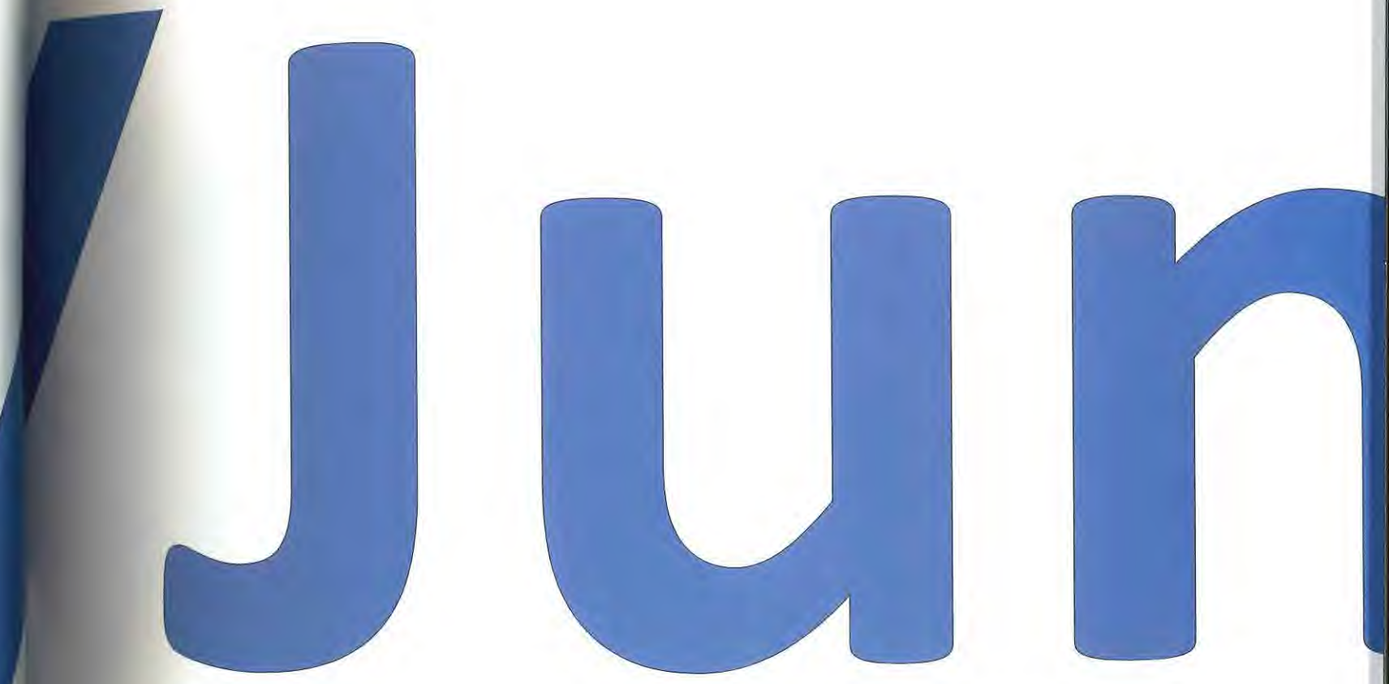


Raising Awareness

[Redacted] I was really shocked when [Redacted] alerted me to the proposed, huge wind farm at sea, southwest of Mull and Iona. History has shown that being a small island with small resident population, Iona has always been vulnerable to exploitation, and now again, 21st century style. I spent a day there last week, soaking up that special atmosphere that Iona has, and talking to local people, who needless to say are against it, but must feel helpless. So, for me, I think an end product of the An Tobar / An Fenten Project should be about using our artistic skills, and energy to raise awareness.

st Painting





Iona Elegy

How do you make art out of a horizon?

Where I left it last time was with reflections on this horizon photograph from an Iona Community paper.

I also mentioned a painting I was studying with one of the most potent horizons. In the far distance is the tiny speck of a ship coming or going? Julian Barnes writes of Gericaults 'Raft of the Medusa'.

We are all lost at sea, washed between hope and despair, hailing something that may never come to our rescue. Catastrophe has become art;

Barnes raises the question how to translate a complex, burning issue into art?

Gericault's painting 'is however not just a dramatic moment, embedded in its pictorial representation in surprising ways is a critique of why the painting came into being, the failure of authority, leadership, governorship and state ambivalence. Issues indeed that are shared with how the 'sacred isle' of Iona has found itself the 'host' of an inordinately large windfarm off its shores.



Using that painting this painting ‘Iona Elegy’ speculates an approach, as to how to embed Iona’s contemporary narrative for today’s audience exploring three broad strategies.

1 the need for a narrative backbone,
2 the idea of embedded figuration and
3 an expanded vision of the canvas as an omnidirectional platform to carry the message providing a variety of viewpoints.

Proem (I)

Three distinct texts provide the narrative foundation for this project, spanning the ancient, early Christian, and early modern worlds. Together, they serve as a framework to critique the proposed developer-led wind farm situated near the sacred island of Iona.

The anchoring text is Adomnán's *The Life of Saint Columba*. While its survival through the centuries is remarkable, the document offers an incredibly intimate, three-volume insight into the Saint's actions and the island's historical landscape.

Because the pre-Christian era lacks similar documentation—defined instead by oral traditions, heroic legends, and polytheism—I draw upon Homer's *The Odyssey* to capture the spirit of that age.

The final pillar is Cervantes' *Don Quixote*, widely regarded as the first modern novel. Famous for the collision between a delusional knight and a field of windmills, its inclusion introduces an element of the absurd, perfectly encapsulating our contemporary incredulity toward the proposed development.



Narrative backbone



dyssey

omer

English Prose by

el Butler



PENGUIN CLASSICS

ADOMNÁN OF IONA

Life of St Columba

Proem (II)

Iona is more than beautiful topography and setting; it is a landscape anchored by the profound narrative of Saint Columba. As an artist, my challenge is to embed this figurative presence into the land itself, drawing direct inspiration from these texts.

The structural solution lies in Paul Cézanne's late masterpiece, The Large Bathers. In his 1988 book 'Interpreting Cézanne', Sidney Geist revealed that the center of this painting contains a "hidden image" of a woman's head—an optical overlap hiding in plain sight.

While Cézanne's work is famously proliferated with faces in trees, rocks, clouds, and apples, major critics have long dismissed these as instinctive, unconscious, or unintended. Crucially, they lack an explanatory narrative.

My work reverses this paradigm. I reject the accidental. By consciously integrating overlapping figurative elements into the landscape, I seek to embed a deliberate, binding narrative that honors the historical and spiritual weight of Saint Columba on Iona.



Paul Cezanne *'The Large Bathers' Philadelphia*

Art as a figurative landscape narrative



472

Proem (iii) An Omnidirectional stage

Recent research published in early 2025 suggests that Jackson Pollock may have embedded hidden figurative narratives within his work. As reported by Artnet News, researchers refer to these hidden, recognizable images as "polloglyphs," arguing they were intentionally camouflaged by his signature drip technique. They claim his 1945 painting, *Troubled Queen*, can be rotated to reveal a variety of forms—including a charging soldier with a hatchet, a Picasso-esque rooster, a goggled monkey drinking wine, and an angel of mercy holding a sword.

My own observation of the piece aligns with this to an extent: a 180-degree rotation yields the form of a monkey, while a 90-degree shift reveals the soldier, though the "hatchet" read more like a horse's head to my eye. More importantly, this study highlights how Pollock expanded the narrative capacity of canvas by making it fundamentally omnidirectional.

In poetry, text rapidly shifts the reader from one visual impression to another; a single line of a Katrina Naomi poem refering to kissing a "no entry" sign, instantly conjures a flash of imagery before moving on. While painting traditionally struggles to achieve this rapid sequence, Pollock's multi-angled approach solves the problem. By forcing a change in the viewer's physical viewpoint, he successfully creates that exact same cinematic, visual jump.

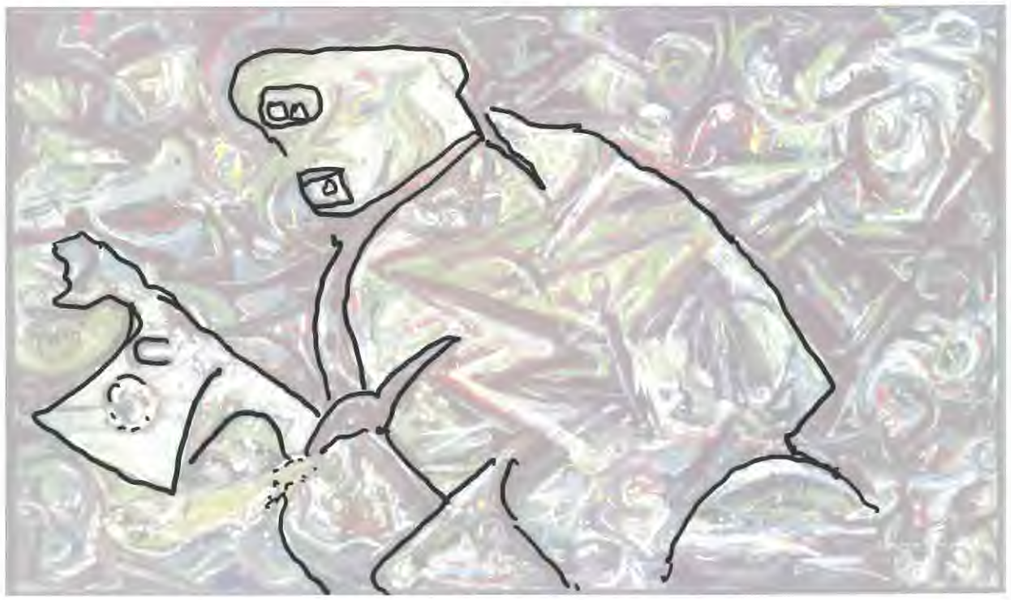


Jackson Pollock '*The Troubled Queen*' Boston

carrying a landscape figurative story







Verse 1 Saint Columba's Return

This diptych is a go at it. Ancient, early Christian and Modern worlds converge.

Saint Columba appears as a stone Celtic cross mounted upon a Curragh, is being summoned back to Iona after fourteen centuries—just as Odysseus endured a ten-year voyage to return to Ithaca in Homer's Odyssey.

Sailing from Ireland through fractured, turbulent seas the Curragh passes beneath a triumphal arch formed by the 91st proposed 340-meter-high wind turbine.

To the right side is the memory of the violent Viking sea-borne incursions; to the other, an array of the other 90 turbines stretching cold into the horizon.

Beyond this turbulent foreground, the cross and Iona sit in relative calm.

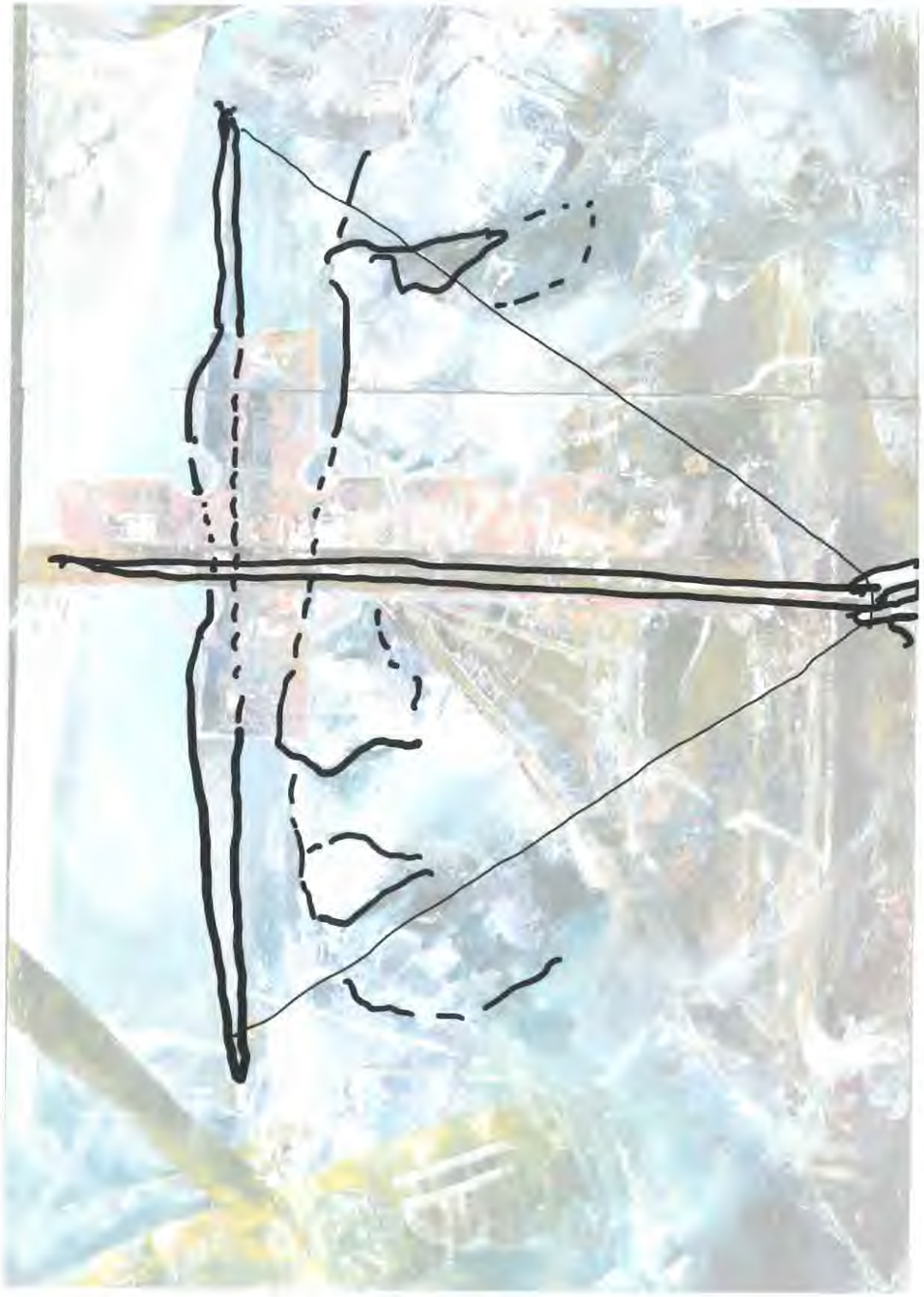
Lashed to the mast, the cross recalls Odysseus binding himself to resist the sirens' song.

To see the flanking figures of Adomnan and Odysseus, the viewer must become the sea itself, in a back and forwards rotation.





Verse 2 Odysseus' Bow and Arrow





Tilt your head to the right, and Odysseus emerges, Iona transforming into his bow and arrow. It was with this bow that he slew the 108 suitors competing for Penelope.

A number hauntingly close to the many turbines now claiming a place in Iona's future.

Odysseus's painted arrow is aimed at the groin of Turbine No 91.

V.3 Adomnan's Quill & Parchment





Tilt your head left, and Adomnán appears, his writing reed and parchment replacing bow and mast, summoning divine assistance through the written word.

Between these opposing but collaborative forces, the cross remains steady—the apex of a pyramid.

The modern world however turns the Ancient and Early Christian world upside down.



End Canto - Tilting at Windmills

The modern story belongs to Don Quixote, unhorsed as his lance entangles with a windmill sail. This fracture is mirrored in the rotated canvas itself, evoking the plains of La Mancha before it reaches the sea at the end of the book. Quixote to the left in his armor, Sancho Panza at the centre, and the windmill giants to the right.

Don Quixote's madness stems from a total isolation of perspective. Cervantes gives him no past, no family, and no grounding; his entire existence is single-mindedly predicated on a bygone code of chivalry which he has read in books.

Likewise, the scale of the wind farm proposal operates within its own isolated frame of reference: engineering alone. Because the rock seabed is close to the surface, the project is pushed forward—a single-minded technical madness that excludes all social, historical, and cultural influences.

Of course I am '***Tilting at Windmills'*** too, to quote Cervantes. I am a disciple of Don Quixote tilting at not yet built turbines. W. H. Auden observed that human sanity relies on a continuous internal dialogue between Don Quixote (our ego) and Sancho Panza.(our physical reality).

If we are only Don Quixote, we become tyrannical fanatics; If we are only Sancho Panza, we become entirely cynical and listless.





End Canto (Detail) - Finding Balance





481

But perhaps I am saved from my insanity because my world view is ameliorated by my being a disciple too, of Sancho Panza, who from untrained origins becomes a figure of recognised wisdom, and guidance to Don Quixote.

He thus occupies rightfully the central position on the paintings rotated cross and it is Sancho who speaks most plainly in the novel:

"Look, your worship, what we see there are not giants but windmills."

But looking up the structures 340 meters high off the coast of Iona , the dialogue shifts to to address the sheer scale of modern industry, Sancho and his author Cervantes might have instead whispered;

"You are right. They are giants."



482

'A Call to the Living and Those Before'

At the end of the Odyssey, Homer has the vanquished suitors in Hades, the underworld of the dead, still speaking of the battle for their lives; they are not dead as ideas, but live on.

This painting, captured in its new subtitle, is a call for us, those ideas, and those ancestors to return and stand our ground against the giants.

The subtitle of this view therefore becomes '***A Call to the Living and Those Before'.***

Columba sits at the pyramid's apex, with Odysseus, Adomnán, Columba's mother, Queen Margaret, George Macleod, William Cadell, John Smith, Boswell and Johnson, Turner, Peploe, Ina Duchess of Argyll, Helen Campbell of Blythswood and us all, the viewers, and all who have gone before resting below.

nning Objection

une/Ju

Preamble

In the eyes of the law, a landscape is not merely a physical space, nor is an Environmental Impact Assessment (EIA) a definitive ledger of its worth. Instead, under Scottish marine planning and consenting law, environmental decision-making is governed by a strict statutory framework designed to synthesise different ways of seeing, recording, and knowing a place.

For this book, ***ONE IONA***, exploring this legal background provides the structural foundation. It demonstrates that under the law, the voice of a local resident, here an artist, the data of a corporate developer, and the feedback of a state scientist do not exist in a hierarchy. Upon submission, they are legally synthesised into a singular, democratic construct known as **"environmental information."**

I. The Statutory Principle of Unified Identity

The primary legal mechanism for parity is found in The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The regulations do not separate inputs by the status of who sent them; instead, they explicitly merge them.

Under Regulation 2(1), the legal definition of *"environmental information"* is established as a collective, indivisible asset. It mandates that the term encompasses:

a) The technical EIA Report provided by the applicant.

b) Any supplementary or further information submitted during the process.

c) The statutory and non-statutory consultation responses from official bodies.

d) Any representations duly made by any other person (the public) concerning the environmental effects of the works.

The law creates no hierarchical distinction between paragraphs (a) through (d) of Regulation 2(1). Once a public representation is *"duly made"* within the statutory timeframe, it undergoes a legal alchemy. It ceases to be a mere "opinion" or "objection" and is elevated to the exact same legal status as the developer's multi-million-pound environmental statement. **They occupy the same legal bucket**.

II. Parity of Obligation: The Indivisible Prerequisite
This unified identity dictates how the state must behave. The Scottish Ministers (acting through the Marine Directorate) are legally prohibited from making a decision unless they have weighed this collective information uniformly.

The Statutory Bar: Regulation 4(1) dictates that the Scottish Ministers must not grant a marine licence or Section 36 consent for an EIA project unless a full assessment has been conducted.

The Equal Duty: Regulation 4(1)(b) strictly mandates that this assessment requires decision-makers to take into account the entirety of "the environmental information".

e statutory duty is not to "examine the developer's report while
ting public concern." The duty is to assess the wholeness of the
ormation. For the Marine Directorate to ignore, minimize, or treat a
blic representation as secondary to an applicant's report is a distinct
each of Regulation 4(1)(b). Procedurally, a failure to properly weigh
blic representation is identical to failing to read a chapter of the
veloper's technical submission.

The Evidentiary Principle: Substance Over Status
public law, the weight of evidence is dictated by its relevance and
bstance, not by the institutional power of its author.

o Legal Hierarchy: Nowhere in the 2017 Regulations or the Marine
cotland) Act 2010 is it stated that an expert ecological report, an
chival map, or a cultural testimony submitted by a member of the
ublic is legally subordinate to a report submitted by a developer.

ne Material Consideration: If a public representation provides credible,
vidence-based environmental data—be it local ecological knowledge,
tizen science, or independent analysis—the Marine Directorate cannot
ismiss it on the grounds of its origin.

To dismiss public data simply because it did not originate from a statutory consultee or a corporate applicant constitutes a failure to take into account a relevant material consideration. In Scottish administrative law, this renders a final decision unlawful and vulnerable to judicial review on the grounds of procedural unfairness and Wednesbury unreasonableness.

IV. The Fact-Finding Duty and the *'Reasoned Conclusion'.*
The law demands that the Marine Directorate act as an independent arbiter, actively synthesizing conflicting representations to reach an autonomous verdict.

The Duty to Decide: Regulation 4(1)(c) requires Ministers to reach a *"reasoned conclusion"* on the significant effects of the works on the environment.

The Mandate for Transparency: Regulation 28(2) dictates that the final decision notice published by the state must contain a summary of how the environmental information - explicitly including public representations - was addressed and integrated.

e Marine Directorate cannot simply adopt the applicant's EIA Report an objective truth if a public representation raises a valid, conflicting vironmental point. The requirement for a *"reasoned conclusion"* forces e state to resolve these conflicts openly. The decision-maker must stify why one piece of environmental information was preferred over nother.

onclusion: Representation as a Legal Right

Within Scottish marine planning law, "representation" is not a assive act of witnessing; it is a statutory act of creation. By ubmitting a representation, the public actively reshapes the egal landscape of the decision-making process. The law emands that the art of public observation be treated with he exact same weight, gravity, and legal authority as the cience of corporate speculation. They are, by definition, qual parts of the same information.

Objection 23-07-26

To the applications made by MachairWind Ltd for consent under Section 36 of the Electricity Act 1989 and for the associated Marine Licenses under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed MachairWind Offshore Windfarm (Marine Directorate references 00012385/00012386).

INTRODUCTION

In the Planning Statement for the Machair Wind Farm application case reference 00012385 to the Marine Directorate, Section 6.2.4 'Visual Environment', it concludes:

> *'...the significant adverse effects on the qualities for which the area has been designated are* ***outweighed by the social, environmental and economic benefits of national importance which would be delivered by the Project.'***

Likewise under Section 6.2.5 'Cultural Environment', it concludes:

> *'As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that* ***substantial harm would not arise to any designated heritage assets'***

What it is important to check, is in the light of Iona's spiritual and cultural national and **world** importance, **has the island been fairly assessed and scored in the EIA documentation, against the relevant Scottish Planning Policies, such that the Planning Statement can draw these conclusions?**

POLICY CONTEXT

toric Environment Policy for Scotland (HEPS): Issued by Historic Environment Scotland (HES), this document sets out core policies (such as Policy HEP4), ch explicitly demand that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.'

tional Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development posals affecting scheduled monuments will only be supported where:

i. ***direct impacts*** *on the* ***scheduled monument*** *are avoided;*
ii. ***significant adverse impacts*** *on the integrity of the* ***setting of a scheduled monument*** *are avoided; or*
iii. *exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

tland's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23 *Designated heritage assets* – representing sites of national or ernational significance for which statutory requirements apply.

'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'

ANALYSIS OF THE PLANNING STATEMENT

The Planning Statement in Section 6.2.4.2.3 states:

178: As for the nationally and locally designated landscapes above, it is the LCTs and CCAs in closest proximity to the WDA that were predicted to experience significant adverse effects. Major adverse effects were identified on LCTs across Colonsay, Oronsay and northwest Islay, with effects reducing to ***moderate adverse significance on Iona,*** *the Rinns of Islay and the south and west coast of the Ross of Mull.*

ey are clear that there are effects on the island of Iona's setting determined as 'moderate adverse.' They go on as follows in their conclusions about the pact on particular visual receptors.

179: Similarly, effects on visual receptors at identified viewpoints or at settlements and travelling on routes were of major adverse significance at the closest locations to the Project (VP14 Colonsay, VP13 Oronsay, VP 1, 2, 3, 4 northwest Islay), ***with effects reducing to moderate adverse at a greater distance from the WDA or from elevated positions on*** *Islay (VP5 and 7), Colonsay (VP9, 15 and 16), Jura (VP10), Mull (VP20 and 21) and* ***Iona (VP22)***

1. This scoring outcome (moderate adverse) determined specific to Iona is for the setting of the Abbey and Nunnery, the Conservation Area and the approach route from Fionnphort to the island. They conclude from these assessments that:

> *'Whilst the relevant policies do not reference effects on these receptors, the nationally significant beneficial effects of the Project and its contribution to achieving Scotland's offshore wind ambition, net zero and decarbonisation targets* ***outweigh the identified significant effects.'***

This means that the scale of detrimental impact to Iona and its listed buildings is not of such substance as to outweigh the economic and social advantages of the development. They acknowledge the adverse impacts ('harm') but say that only limited areas are subject to major adverse effects and that Iona is not amongst these in any case

-

> *'The Project would give rise to some* ***limited major adverse*** *effects on SLVIA receptors. However, major adverse effects are not experienced at the most sensitive nationally-designated landscapes. Effects at the Jura NSA were identified on relatively few aspects/locations within a small subset of SLQs for which the area is designated, and it is* ***therefore demonstrated that the overall integrity of the area will not be compromised.'***

Crucially they conclude and reiterate that any detrimental impact is outweighed by the project benefits.

> *'In addition, the significant adverse effects on the qualities for which the area has been designated are* ***outweighed by the social, environmental and economic benefits of national importance*** *which would be delivered by the Project. Further detail on the balance between the identified significant effects and the Project's social, environmental and economic benefits is set out in Section 7.'*

Should however the EIA scoring be proved to be incorrectly assessed then there may be a case for reconsideration of the Planning Statement conclusions, that is, is the detrimental impact caused greater than anticipated such that the conclusions might be altered?

3. ASSESSMENT OF DETRIMENTAL IMPACT TO A HERITAGE ASSET

In Section 6.2.5.2 'Planning Assessment Conclusions for Cultural Environment' of the Planning Statement, (paragraphs 186 to 194) expands on how the threshold of detrimental impact is considered:

> *'GEN 6 of the NMP states "Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.*
>
> *Paragraph 4.23 of the NMP goes on to state "...] Designated heritage assets - representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or* ***harm*** *to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss [...]".* ***The policy requirement is therefore to avoid substantial loss or harm.***

How 'harm' to, or detrimental impact on, the heritage asset is defined is therefore important. The planning statement goes on to determine how detrimental impact is defined and recourses to legal case to support its position. It states:

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

e planning statement is correct in that case law in England does set a high bar based on case history. However Scottish Law is different. While English se law sets a high bar, Scottish planning law operates under a distinct framework. The submission incorrectly applies an English legal test to a Scottish nning context, where it holds no material weight or binding authority.

e applicant's assessment of heritage impacts relies on English High Court precedents—specifically *Bedford Borough Council v SSCLG* and its bsequent updates. In the English planning context, these cases dictate that harm to a heritage asset is only 'substantial' if its significance is tirely 'drained away' or 'vitiated.'

wever, this baseline is not applicable to the MachairWind application for the following reasons:

No Binding Precedent: English High Court decisions are not binding authorities in Scotland. The Scottish planning system is separate, verned by its own primary legislation and national policy framework.

Policy Misalignment: The distinct English categorization of heritage impacts into binary thresholds ('Substantial Harm' versus 'Less than bstantial Harm') does not exist within Scottish planning policy. By framing the assessment around this specific English legal threshold, the mission does not align with the statutory requirements of Scottish planning law.

EIA ASSESSMENT: EIAR

Planning Statement goes on to clarify that detrimental impact ('harm' as the applicant states) can only be assessed dependent on an independent essment - in this case the EIA:

The test of whether harm would be substantial is independent of valuation of the asset, and therefore reference to criteria used in the EIAR for establishing the magnitude of impact are relevant.

mination of the EIAR, in particular Chapter 14 and its Appendix 14 provided by the applicant, therefore needs to be undertaken to check that all the vant criteria have been assessed and a fair and reasonable assessment of impacts has been determined such that the Planning Statement is correct in ing:

191 As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets.

n the outcome of these assessment conclusions showing that impacts are not above a threshold, the Planning Statement concludes that the utory requirements have been met.

Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.

of course depends on the EIA assessment having considered all the criteria fairly and reasonably.

5. ADVERSE IMPACT IN THE SCOTTISH PLANNING POLICY CONTEXT

Given that the 'high' legal bar for adverse impact to a Heritage Asset, as asserted by the applicant, does not exist in the Scottish Planning Context, the Planning Statement does offer a more conciliatory reading:

> *'190 cont. Chapter 14 Offshore Archaeology and Cultural Heritage of the EIAR defines a high adverse impact as where 'key elements of the asset's fabric and/or setting are lost or fundamentally altered, such that the asset's cultural significance is lost or severely compromised.*
>
> *'While this represents a relatively coarse banding of magnitudes of impact up to and including total loss of a heritage asset, this is a **useful lower threshold for harms that could be considered to be substantial** and which would require consideration under this policy.*
>
> *'NPF4 refers to the concept of integrity of setting defined by HES as "changes to factors of setting that contribute to cultural significance such that understanding, appreciation and experience of an assets are not adequately retained will affect the integrity of setting".'*

What is not made clear is that in Scotland heritage impact must be assessed against Policy 7 (Historic Assets and Places) of NPF4. Policy 7 critically **does not require an asset's significance to be completely destroyed ("vitiated") before an application can be refused.**

Instead, NPF4 Policy 7c explicitly mandates that development proposals affecting a listed building or its setting will only be supported if they "preserve its character, special architectural or historic interest."

The question to be determined by examination of the EIAR is how the insertion of 91nr, 340-metre-tall wind turbines into the open seascape that forms the historic and spiritual backdrop of Iona and the link back to Ireland, does not breach the threshold of concern regarding how the development directly affects the ability to "preserve" its setting.

In the Planning Statement's view, Chapter 14 and Appendix 14 assessments confirm that the threshold of concern is not breached and '*the fundamental relationship between these assets and their surroundings, with historical, functional and cultural links to the sea, and the landscapes surrounding the Scheduled Monuments remain in essence unchanged*'. This is not an accurate assessment.

This statement shows the importance of checking and determining whether, as per the scoring conclusion of the EIAR, that there are, as the Planning Statement is concluding, '(193) *No adverse effects to integrity of setting therefore relate to a **fundamental** shift in the relationship of an asset in its surroundings that would arise through loss or radical change to fundamental elements of that setting.*'

The Planning Statement suggests an acceptable balance is achieved because the historic and cultural settings remain visible despite the scale and proximity of the Windfarm. In practice, however, these settings cannot be separated from the visual impact of the development. The applicant is effectively asking the Marine Directorate to accept that the historical asset can still be appreciated, despite its setting being significantly altered and compromised by the project.

> *193 cont In addition, the perceptual prominence of the assets remains over the WDA infrastructure. While there would be, in some cases, a reduction in the perceived remoteness or expression of dominance, these characteristics would remain legible and understandable to a viewer and their ability to appreciate the contribution of those characteristics to the asset would remain.*

nal conclusion confirms the stance of the Planning Statement, which based on the EIA Chapter 14 and Appendix 14 assessments, no threshold is d.

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

e criteria that lead to this conclusion contained within Chapters 14 and Appendix that requires to be checked against Policy HEP4.

citly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed – not simply accepted as ned.**

RITAGE PROTECTION IN SCOTLAND

the Historic Environment Policy for Scotland (HEPS), heritage protection is balanced through carrying out a qualitative assessment of an asset's ral significance" and its relationship with its environment.

c Environment Scotland's Managing Change guidance defines setting as the way in which the surroundings of a historic asset or place provide its t, experience, and understanding.

case the open, uninterrupted western and southern seascapes are intrinsic to how Iona has been experienced for centuries as a place of isolation, nage, and spiritual reflection. The industrialisation of this horizon will directly affect that setting.

ferred the applicant to the EIA handbook in their various consultations. The opening section of the handbook summarises the assessment criteria:

6. 7. The simplest definition of "Landscape" is "the appearance of the land". Landscape is everywhere and may comprise rural landscape, urban landscape (or townscape), urban fringe landscape, coastal landscape, seascape, etc.

However, human perceptions of place also include things that cannot be seen but which add to the appreciation of places; these are:

a. feelings generated by other senses – touch, hearing, smell, taste;

b. feelings generated by a knowledge of the place (its cultural and historical associations with people, events, etc.);

c. feelings generated by past experience of the place, or similar places – life experience.

6.8: These combine to give an experience of landscape perceived by all the senses – sight, sound, smell, touch, taste – and by knowledge.

the three factors that make up a landscape are mental not physical that is 1) '*knowledge*' and 2*) 'past and life experience*'.

The following assessment reviews how the application submission Appendix 14.3 assesses these two significant criteria in relation to Iona.

HES (13/06//25) refer to their 'Managing Change: Setting (2020) document. HES are recorded by the applicant in 14.3 as saying that (with suggested grammatical corrections in brackets)

> *'highlighted that impacts that (make) change to a setting that effects the way an asset is understood appreciated and experienced(,) then the integrity of the setting is affected'* .

HES in their scoping discussion with the applicant (9/01/25) are recorded as stating that;

> ***'On the basis of the information provided to date, it is likely that the proposed windfarm would impact the setting of a number of scheduled monuments.'***

Assessing that impact fairly and responsibly is the role of the EIAR

.

7. APPLICANT'S ACCEPTED VISUAL IMPACT OF TURBINES

The applicant states that their wind turbines (WTG) **will disturb and alter the setting of the Historic Assset.** In their Appendix 14.3 they say as much and many times. Here is a selection:

> *The nearest WTG will be located c.24 km from St. Mary's Abbey. The ZTV (Figure 8), visualisations (Figure 9, Figure 10 and Figure 11), and site walkover all indicate that the* ***presence of the WTGs would represent a discernible change to the setting of St. Mary's Abbey.*** *The visibility of the WTGs would be greatest on the east side of the scheduled area (towards the foreshore) with the WTGs falling away as the viewer moves westward towards the Abbey.*
>
> *Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide clearer visibility of the proposed WTGs across an approximate 10-dearee arc of view.* ***In these views there would be a degree of juxtaposition of the WTGs with the Abbey,***
>
> *Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide* ***clearer visibility of the proposed WTGs across an approximate 10-dearee arc of view.*** *In these views there would be a degree of juxtaposition of the WTGs with the Abbey, but most of the array would be obscured by the Abbey itself, which would remain the dominant element in these views.*
>
> *The* ***WTGs would be visible from St. Columba's Shrine*** *(Figure 21). In this view, they would, however, be largely screened by the higher ground to the west and south-west of the Abbey and by Iona Village;* ***in these views the WTGS would be seen*** *against a horizon broken by the intervening buildings and trees.*
>
> *A photomontage was captured from Cladh an Diseart (Figure 23) which may represent the site of a small chapel and bural site and contains a carved rock know as 'Columba's Table' at the request of HES.* ***While some WTGs will be seen from this location, the dominant feature is the Abbey***

due to its scale and prominence, and the nature of the view upwards towards the abbey, which emphasises its scale and solidity against the horizon. The WTGs would appear as back ground features...

Views across St Oran's Chapel and between the Abbey complex and Martyr's Bay along and to the east of the Sraid nam Marbh (Street of the Dead) are illustrated in viewpoint CH7 (Figure 10). ***This viewpoint offers possibly the clearest visibility of the WTGs from within the scheduled area, and the WTGs would appear in an approximate 12 degree arc of view.***

The WTGs would appear as background features in general views along Iona sound and more generally out to sea, *a view which is already* ***disrupted by Iona village****, the ferry and associated harbour works.* (Note: The use of the applicant's word 'disrupted' in relation to intrinsically integrated elements of the Iona experience, the village, is entirely inappropriate. The rotating turbines will disrupt the long held view, what will not disrupt the view are those elements that make up the experience of that established view.*)*

he applicant is unequivocal, the setting of specific listed monuments on Iona will change,
y their own statements, the proposed development fails NFP4 Policy 7 (Historic Assets and Places) because it explicitly dictates that development roposals affecting scheduled monuments will **only be supported** where direct adverse impacts on the monument are avoided, and "significant dverse impacts on the integrity of setting of a scheduled monument are avoided".

SEA SETTING OF IONA

ES raise a bigger question though and that is, it is not only the visual effect of the turbines on the listed monuments but the whole setting of Iona which at stake within which the listed monuments sit. They say (9/01/25) that there is concern for those monuments;

'In particular, those that are early Christian and that often depend on a sense of place and isolation derived from being set on the edges of landforms and a relationship with the wide open sea. At this early stage, it is not possible to establish whether the severity of these impacts would likely raise issues of national importance such that we might object. The EIA Report should fully assess these, including wireframes and/or photomontages, where appropriate.'

other words the EIAR (based on the handbook advice) in addition to visualisations, should therefore seriously review the '*knowledge*' of the Christian gins of the setting and the relationship of the coastal edge and sea in its making, not just the physical visual reality. At the same time the EIA report ould explore the ***'experience'*** of that setting in particular its 'sense of place' and 'isolation' both then and now.

ey continue:

'Particular attention should be given to monuments that have a known visual relationship with the sea that contributes substantively to their cultural significance and where
changes as a result of the proposed development might result in significant effects.

'Without prejudging future assessment, it is likely to be those sites that contain components of monastic or early Christian occupation that have the greatest potential for a significant adverse impact on their settings. Some cluster around fertile land and sheltered bays and are often associated with earlier high-status farmsteads such as mediaeval sites where Christianity was promoted by the elite, for example Nave Island,

monastic site, Viking house, chapel, burial ground, settlement and kelp-burning kiln (SM3233). Others are in more isolated locations and occasionally inserted into the remains of brochs and other Iron Age sites. The most evocative, often those ascribed with the most spiritual associations by modern communities, exploit an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat, a place physically and visually cut off from the rest of the world.

'Their sense of place derives from being 'on-the-edge, exposure to the sea and a level of perceived wildness. A large number of turbines present within outward views of the sea from these sites is likely to represent a significant alteration to their settings.'

HES are clear in the case of Iona that the '*knowledge*' of the origins of Iona's development as a Christian settlement, accessed and built from the sea and lived as a Christian settlement on the sea is fundamental to its understanding.

But HES seeks to bring that history up to date, by saying that not only the '*knowledge*' of that locational choice but also the '*experience*' of that sense of detachment from the rest of the world was a conscious act of their religious leadership. That the feeling of being alone at the limits of the then settled world tested the communities collective resolve and faith. To this end the sea horizon and wildness (and one imagines days of calm) where the weather met the land are crucial in that mix of creating for want of better words an ambience or atmosphere that supported the celebration of their beliefs.

But HES do not limit their assessment to long gone history, they associate it with our ***'experience'*** now as modern communities and the importance for those communities captured in the idea of being spiritually exposed to '*an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat,'*

In HES's view the '*knowledge*' of that essence of Iona's location and setting which was shaped historically, still has significant value today.

It is accepted that it is hard for us with all the benefits of modern life to imagine living on this precarious edge, but we are fortunate to have written evidence of what it was like.

There has been a remarkable literary survivor of that age that informs us of the issues addressed by HES. The 9th Abbott of Iona, Adomnan (d 704AD) wrote three books on the 'Life of Saint Columba' that document the conditions they lived under and the inextricable connection between land and sea. A word of caution for modern readers, each book is a series of 'parables' and we have to be careful in this context not to bring our modern perceptions to a world where you didn't know the next day's weather, what the seasons might bring, whether crops would grow what neighbouring communities might be thinking and doing. In that chaos, stability was found in the hope of a divine guide hence the style of Adomnan's book. A selection of quotes from his book shows the inextricable link between the island and the sea.

Book 1 Chapter 4
'Once in Iona, one day of crashing storm and exceptionally high waves.....the boat for which the brethren were waiting arrived as the saint foretold.....by God's gift a marvellous line kept them apart, so that they had not felt the storm though, they said they could see it far off'.

1/19
'My son, you must be very careful today. Do not try to go directly across the open sea to Tiree, but instead take the roundabout route by the Treshnish Islands. Otherwise you may be terrified by a monster (whale) of the deep and find yourself scarcely able to escape'

2/12
'Once, when St Columba was at sea, he found himself threatened by danger. A great storm, with gusts of wind blowing from all sides, arose and his boat was tossed and buffeted by great waves.'

2/13
'On another occasion St Columba's companions called on him during a wild and dangerous storm that he should pray to the Lord for them.'

But how should we understand the sea in relation to Iona? We will now consider that.

9. IONA AS AN ISLAND

comment from the applicant in Appendix 14.3 underlines a disconnect regarding the relationship between the island of Iona, its historic monuments, and its maritime landscape. The historic assets and the surrounding sea are inextricably linked. The applicant states:

'Views towards Iona and across the Sound of Iona on the ferry journey from Fionnphort would again be minimally affected as demonstrated by Figure 20. ***In this view a greater proportion of the WTGs would be visible, however, there would be a 130-degree arc of separation between the nearest WTG and the Abbey*** *(Figure 20b and Figure 20c). During the ferry crossing to Iona the viewers attention in these views is generally toward the Abbey as the focal point of the pilgrimage,* ***and the view out into the ocean is read by the viewer as a different space to that occupied by the Abbey.'***

In essence, the applicant argues that because the windfarm and the Abbey sit 130 degrees apart, a visitor can simply look toward the Abbey and ignore the development. This logic assumes that human perception can artificially compartmentalise the landscape, treating the ocean and the island as entirely separate, unrelated spaces rather than a single, unified historic environment.

In Planning terms the island is seen as a whole, a statutory APQ - An Area of Panoramic Quality - but looking back in history it has been seen as a whole entity. Richard Sharpe the translator of Adomnan's 'Life of Saint Columba', says *'The role in which St Columba seems particularly a Scottish saint is as the missionary who converted the Picts north of the mountains. This is the part that Bede gave him'.* He goes on to quote Bede (d 735AD and seen as the 'Father of English History):

A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. ... Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon; he converted that people to the faith of Christ by his preaching and example, ***and received from them the island of Iona on which to found a monastery.*** *(Bede, III 4)*

From the very beginning the monastery and island were seen as one. Richard Sharpe confirms this 'whole' island Abbey view when he writes:

'Adomnán several times speaks of Iona as ***'our island'*** *and once as* ***'this our principal island'*** *(I 1). It is clear that in his own day, when the saint was invoked to bring an end to the drought (II 44), the cultivation of the island was in the hands of the monastery. His stories of the monks' working in the fields at the machair suggest that he believed this was so in Columba's time. The monastery itself was situated on the east side of the island,*

looking out across the Sound to the Ross of Mull. There is no doubt that it was on the raised beach of cultivable land where the abbey stands today.'

We are fortunate to have Adomnan's record for he confirms the sense that the island land was worked for the benefit of the monastery:

1/37
....For once the brethren were returning to the monastery after a day's work on the harvest. They had reached the place called Cúl Eilne, which is reckoned to be the halfway point between the machair on the west side of Iona and our monastery.....

2/28
One day of early summer, shortly before he passed to the Lord, St Columba went by cart to visit those brethren at work building a stone wall around the machair on the west coast of Iona.

3/16
Likewise, on another occasion, when St Columba was living in Iona, he addressed the assembled brethren, making his point with great emphasis, saying;
"Today I shall go to the machair on the west coast of our island, and I wish to go alone.

No one is to follow me therefore. They obeyed and he set out alone as he desired. But one of the brethren, who was an artful scout, took a different route and hid himself on the top of a little hill that overlooks the machair, for he was eager to find out why the saint had gone out alone. From his vantage point, he could see St Columba standing on a knoll among the fields and praying with his arms spread out towards heaven and his eyes gazing upwards.

The applicant in his Appendix 14.3 takes a much narrower perspective for their assessment essentially the listed precincts, except that they widen it to include the route as experienced from Fionnphort. What we have seen is that a broader view **is required,** but for the whole island. That the historical research and consequent imaging of the Machair Wind Farm need to be investigated island wide, not just the limited zone identified.

10. DALRIADA AND THE LINK TO NORTHERN IRELAND

The understanding of role of the sea is important to HES for other reasons, and this comes up again in HES guidance to the applicant specifically with reference to St Mary's Abbey;

St Mary's Abbey, Iona, monastic settlement (SM12968) comprises the remains of the large early historic monastic settlement founded by St Columba in AD 563, now occupied by restored medieval buildings associated with the Benedictine Abbey of St Mary founded around AD 1200. It is the birthplace of Scottish Christianity and internationally renowned for its surroundings and spiritual associations. It was easily reached by Columba and his followers from Ireland by sea and sits at the crux in linking Ireland with western Scotland. Although exploiting a sense of remoteness, its coastal location resembles that of many other monastic sites at a time when the sea would have been the main communication route allowing movement around a network of monastic communities. Its setting includes characteristics of that isolation, its relationship to the sea and the links across to Ireland but also extends to encompass the rest of the island and the complex of other sites across it which are associated with St Columba and the monastery's later history. Key outward views from the monastery include those looking towards Ireland, reciprocal views along the Street

of the Dead, views and other associated links between the abbey, nunnery, Martyr's Bay and many other related chapels, crosses and other sites across the island. The links between this interrelated group of sites combine to create Iona's setting, and all include a relationship along the coast and out across the sea.

thus reassert the importance of the sea and the sense of isolation it engenders in relation specifically to the Abbey. That isolation is not a statement eing lost to the world. The sea was the navigation channel of the islands and most importantly the connection to Ireland, Saint Columba's and equent brethren's roots. Adomnan asserts that very clearly in his 'Life of Saint Columba':

1/12
"...My dear sons, why do you gossip idly about these kings? For both of those you mention were recently killed by their enemies, and their heads cut off. Sailors will arrive today from Ireland and tell you this.'...

1/18
.....This man will accompany you for the few days you are travelling in Ireland, and when you return to us here, he will come with you. God has chosen him, and he will live out life here in my monastery.'...

2/14
Once, the same St Cainnech forgot to take his staff with him when he set sail from the harbour of Iona on his way to Ireland...

2/39
Once, during the period when St Columba lived in Iona, a layman who had only lately assumed the clerical habit crossed by sea from Ireland to the blessed man's island monastery.

nd and particularly the north was not only Saint Columba's base but also the anchoring civilisation of the west coast archipelago of Dalriada and the vas the connective 'tissue' that bound it together and it is in that context that HES write in their initial comments that 'I*t is possible that the proposed ines may be visible within these views and could diminish Iona's sense of isolation and its relationship with the sea.'*

concern for this well-established historically, connection between Iona and Ireland is repeatedly raised in further commentary from HES. Their rded Preliminary Screening comments HES (28/04/25) state on the basis of early wireline drawings that:

'The proposed development would be likely to result in a substantial alteration to the baseline setting of the monument as the sense of place and views across the sea towards Ireland would be compromised. It is not possible to establish from the wireline alone whether the severity of this impact would likely raise issues of national importance such that we would object.'

then again HES (12/12/25) reiterate to the applicant:

'HES confirmed that at present all sites are experienced from land and connectivity is done through land, however for these sites, specifically those which reference Northen Ireland, the sea should be considered as the highway of connectivity between all sites, the Applicant should be assessing what the seascape means in relation to monastic components.'

11. THE WHOLE ISLAND APPROACH

If we take the 'whole island' approach then the impact of the southerly stretch of industrial turbines is seen as it will be perceived, not as a narrowly framed sequence of views around the Abbey but an expansive stretch across the southern horizon. Just as the island was experienced in Saint Columba's time, so it is today with visitors and pilgrims reaching all parts across the island. Saint Columba's bay is in the south a very popular destination and it is there and from the surrounding hills which are well walked that the clear southern aspect towards Ireland will be most mentally obstructed by the phalanx of turbines in the sea.

The applicant writes:

> *'Tor an Aba also affords views in an arc from north through east to southwest, including a view down the channel in the general direction of Ireland and into the open sea beyond. There is no visibility of Ireland, which reflects the possibly apocryphal story that Columba chose Iona as the first landfall out of sight of Ireland, giving a sense of a view back towards a past that was once but is no more. In this sense there is no direct sightline, but the sense of another place beyond the horizon becomes significant.'*

The EIA handbook recommended to be used by HES and which the applicant has said they have used identifies *'knowledge'* of a setting *as a* prerequisite of an assessment. The idea that Columba is inferred to believe he was leaving a past is a nonsensical reading of that historical knowledge. It would be as ridiculous as saying that in a commute from Edinburgh to Glasgow, each time I leave my past behind.

The source of the 'apocryphal' story does not bear up with historical evidence. If as the greatest historian of that age 'The Bede' in his history stated;

> *'A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. ... Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon;* ***he converted that people to the faith of Christ by his preaching and example, and received from them the island of Iona on which to found a monastery.*** *(Bede, III 4)*

Britain at that time was a highly politicised society not in our democratic terms, but a society in which 'biblical law' was being adopted across the land. Columba's landing was not a 'Columbus discovery of America moment', that is an historical mash up completely at odds with the records. According to the most reliable scholar of his time, Columba was 'given' Iona, he did not 'choose' it. The sequence of Columba's to and froing in this political sphere is known only in fragments but in no way supports such an historical understanding.

The applicant's impact assessment underestimates the historical connections between Saint Columba and Ireland, creating an incomplete picture of both past and present cultural 'experience' as defined by the EIA handbook. Historical records, such as Adomnan's accounts, demonstrate that the sea between Ireland and the islands functioned as a dynamic, bidirectional 'highway of activity' (HES 12/12/25).

> ***2/45***
> ***On the first of these, pine trees and oaks had been felled and dragged overland. Some were to be used in the making of a longship, and besides ships' timbers there were also beams for a great house to be brought here to Iona...***
>
> ***The second time was several years later. Again, oak trees were being towed by a group of twelve curraghs from the mouth of the River Shiel to be used here in repairs to the monastery...***

12. THE BIG PICTURE

Amongst the concluding comments of Appendix 14.3 the applicant states erroneously:

> *While the WTGs would be visible on the horizon in views back towards Ireland, as **Ireland cannot be seen from Iona,** this view is a symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified.*

Geographically Ireland **can be seen** from Iona, from the top of Dun 1. But Dun 1 is important in much broader ways. HES allude to that.

HES is recorded to have advised as follows (20/02/26):

> *Wider views across the island can be obtained from the summit of Dùn I; these contribute greatly to an appreciation of the monument's sense of place, as well as communicating more specific aspects such as the monument's relationship with Columba's Bay in the south of the island.*

HES confirms a 'whole island' perspective be taken, that the island mental map is founded on a sense of St Columba's presence hence their citing of the view towards Columba's Bay.

There is evidence of St Columba climbing Dun 1 in Adomnan's 'Life of St Columba':

> ***1/30***
> ***Once the saint was sitting at the top of the hill that overlooks our monastery from a little distance, when he turned to his servant Diarmait and said:***
>
> ***I wonder why it is taking so long for a ship coming from Ireland to get here. It brings a very learned man who has fallen into wrongdoing but will soon come here to perform a fearful penance.'***

The connection back to Ireland re-emerges. And it does again in another passage, in the context of St Columba regularly climbing Dun 1, which can be inferred from the following historical record:

> ***2/4***
> ***Once again while St Columba was living in Iona, as he sat on the low hill of Dùn Las he saw a heavy storm-cloud to the north rising from the sea on a clear day. Watching as the cloud rose, Columba turned to one of his monks sitting beside him, a man called Silnán mac Nemaidon, whose people were the moccu Sogin, and said:***
>
> > ***"This cloud will bring great harm to people and livestock, Today it will pass over here and tonight it will shed a deadly rain over that part of Ireland between the River Delvin and Dublin,...***

In all likelihood Dun 1' was a regularly used high point of Columba's 'whole' island platform for teaching and preaching. Columba's teaching platform can be nicely understood by using HES's reference to (12/12/25) the beehive cell concept of understanding a setting (point corrected to make sense).

*'HES provided an example of the **beehive cell** component and the importance of (not) ignoring the land behind and looking more at liminality of the site and highlighted that this component has not come through in the setting assessment so far.'*

That is you cannot understand the bees and their hive detached from the eco system that supports them. So similarly, Iona cannot be understood without understanding Columba and his 'whole' island, and as HES state the 'contemporary' communities that live 'happily' with that legacy.

13. THE DALRIADAN ARCHIPELAGO

That Columban eco system is much wider however than the island and the immediate sea that surrounds it. It would be quite within reason and normal to imagine Columba climbing Dun 1 with his fellow brethren, to a high point for a physical connection to 'his Lord above' and to the 360-degree expanse of their Christian Mission. The sense of the archipelago he served is captured in Adomnan's texts:

1/12
Once when he was travelling through the rough and rocky district of Ardnamurchan...

2/11
Once, when St Columba spent some time in the land of the Picts...

2/14
Cainnech had reached the southern part of Islay.....

2/15
So it happened that on one and the same day two men, parting from one another in peace, travelled under full sail with a following wind - Baithene in the morning to Tiree, Colmán after noon beginning his voyage to Ireland.

2/22
Just as the saint had said, it brought a great squall of wind, which, finding the robber and his loot in the open sea between Mull and Coll, at once stirred up the waves and sank their boat.

2/24
Once, when St Columba was living in the island of Hinba,...

2/41
Once when St Columba stayed as a guest in Rathlin Island,...

Adomnan's text reveals that archipelago as an interconnected 360-degree world of open horizons with seaborne activity, trade, transportation as well as fishing and hunting. There is no doubt that this bustle of activity would have been under constant observation from the island high point.

It is that 360 degree panorama that the vast wind farm will occupy a large proportion of that view. It will add nothing to the legacy of 1500 years of history of the Christian settlement of Iona, its Abbey and Precincts, the island setting, its sea surrounding it and the horizons of the archipelago of islands.

Machair Windfarm will, from the point of departure to Iona from Fionnphort, be a presence in the 'new experience' of the island of Iona. ere now eyes conceptualise Iona as a 'whole' in its open setting, in the future there will be this new pervading presence of turning turbines ss miles of the southerly horizon.

EIAR infers that the presence of the windfarm can be mentally compartmentalised 'out' and implies ways of doing it:

- Walk towards the Abbey but do not look back.
- Use a soft-focus effect to bring the foreground into sharp relief, letting the background blur into obscurity.
- Mentally chop out the wedges of vistas that reveal the windfarm.

experience' is not like that. Lived experience is a dynamic constantly evolving moving photo or like a film of looking, turning and absorbing, whilst ying your *'knowledge'* to understand what you are seeing. The 91 turbines cannot simply be compartmentalised and erased.

ALTERNATIVE SITE SELECTION

sider the case of the turbine development sited, for instance, west of the island beyond the Skerryvore Lighthouse at a distance similar to the offshore d farms on Scotland's east coast.

is an important scenario because the issue is not the idea of a **remote** windfarm at sea. Most people don't have a problem with that - subject to guarding of wildlife and seabed. The issue is the location of the Machair windfarm so close inshore with all the consequential adverse impacts on the hbouring islands that the **proximity** brings.

is alternative location for the turbine development, upon arriving in Fionnphort, you would see Iona perfectly framed by its southern, eastern, and hern waters, surrounded by its archipelago. The unobstructed, empty horizon looking towards Ireland would remain untouched. In this scenario, you ld only spot the wind turbines when traveling directly out to the development, or from the far west coast of Iona.

is alternative location, the turbines' looming, dominance over Iona's seascape would disappear into the Atlantic horizon. The important historical h horizon of Ireland, Colonsay, Islay and Jura would remain unaltered as would the northern horizon of Tiree, Coll, Ulva, the Treshnish Isles and Staffa.

hy would this alternative site selection not be a logical solution?

uld appear, as the Planning Statement states in 2.2,(22) in its *'Refinements to the Wind Development Area',* that a key criteria is *to 'avoid water hs greater than 60m.'*

application document *'Chapter 4 Site Selection and Alternatives'* states that:

> *The W1 POA is also one of the few ScotWind POAs that is suitable for fixed-bottom turbine foundation technology. Such foundation technology has been proven to be technically viable at scale in the UK and worldwide, with all major commercial offshore windfarms in UK waters (including East Anglia ONE, TWO and THREE which were developed by ScottishPower Renewables (SPR)) using such technology.* ***This is in comparison to the majority of other ScotWind POAs, which are located in deeper waters than the W1 POA and therefore depend on floating turbine foundation...***

However, contrary to the above assertion, SPR have in fact submitted a Section 36 Planning Application to the Marine Directorate for a 3GW offshore floating turbine development called MarramWind. It is therefore well within the capability of SPR to locate the Machair Windfarm remote from Iona and SPR cannot claim they are technically restricted by the 60m depth limit for fixed seabed turbine to locate it in such close proximity to Iona.

Therefore, these adverse impacts which are fully acknowledged by the applicant, and caused by the selected site being so proximate to Iona, do not need to be accepted and '*outweighed by the social, environmental and economic benefits of national importance*' of the development as the applicant claims because it is feasible for the development to be built further offshore using floating technology.

Furthermore, there is entirely no need for any adverse impacts on Iona from a turbine development because it is not technically necessary for it to be in this location.

15. THE IMPORTANCE OF IONA TO THE WESTERN WORLD

The applicant repeatedly cites 'the national importance' of their proposed development. That has to be seen in the context of '**the importance of Iona to the Western world.**'

As Professor Jonathan Burnside, Professor of Biblical Law, University of Bristol Law School, states:

> *As the doyen of art and cultural history, Kenneth Clark, explained in his seminal work, Civilisation, European civilisation survived the collapse of the Roman Empire by the copying of books. Iona was one of only two or three places in the British Isles which provided, for a short time, a modicum of security for this great task. As is well known, Iona was founded by St. Columba, who came from Ireland in the 563 AD. But Iona was considered a sacred place even before he arrived. For four centuries it was the cradle of Celtic Christianity, with the island bearing witness, it is said, to as many as 360 large stone crosses. Clark describes the extremely sophisticated and refined "pages of pure ornament" produced by the Celtic scribes as "almost the richest and most complicated pieces of abstract decoration ever produced..."* ***Thanks to the faith and works of the scribes of Iona, European civilisation got through by the skin of its teeth. The "clear, round lettering" which came from their hands "carried the word of God all over the Western world.***

16. REFLECTION ON POLICY CONTEXT

Looking back at the relevant policies and assessing their criteria:

Policy HEP4 which explicitly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

> *'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.*
>
> *'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.'*

application whilst fully acknowledging that the Machair Windfarm will adversely impact the heritage asset of Iona Abbey and its island text, fails to enhance the assets, fails to minimise the impact because the only way to minimise the adverse impact would be to build the chair Windfarm on a site more remote to Iona than the application site.

ional Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development posals affecting scheduled monuments will only be supported where:

i. ***direct impacts*** *on the* ***scheduled monument*** *are avoided;*
ii. ***significant adverse impacts*** *on the integrity of the* ***setting of a scheduled monument*** *are avoided; or*
iii. *exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

application's direct and significant adverse impacts are fully acknowledged in the application documents and are not avoided. No eptional circumstances have been demonstrated to justify the adverse impact on the heritage assets or their settings which could be ded by building the Machair Windfarm on a site remote to Iona.

land's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23 *Designated heritage assets* – representing sites of national or rnational significance for which statutory requirements apply.

> *'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'*

designated assets' setting, which protects the heritage assets, has not been protected by the very proximity of the selected site to Iona. ding Machair Windfarm on this particular site is not necessary when it could be constructed on a more remote location.

IA SCORING

ard to reconcile some of the scores attributed in the EIAR assessment had a deeper analysis '*knowledge*' of Iona as a setting and a subtle e of '*experience*' been carried out. The above has clearly shown that the examination of Iona's importance by the applicant is wanting, and as a result ides an inadequate basis to carry out a proper assessment. In the technical summary of the whole submission it states under 7.9 (180):

. ***There will be no physical impacts to designated terrestrial heritage assets identified in the assessment. However, it is recognised that during operation of the Project, changes to the setting of these designated heritage assets will occur due to the presence of the WTGs in the seascape resulting in moderate to major changes (significant in EIA terms) to the following designated heritage assets for the WDA alone and combined with the Offshore ECC and onshore transmission assets, based on available information:***
Dubh Artach Lighthouse (Listed Building);
Oronsay Priory and Cross (Scheduled Monument);
Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);
Dun Bheolain, fort, Islay (Scheduled Monument);

- ***St Mary's Abbey, Iona, monastic settlement (Scheduled Monument);***
- ***Iona Abbey (Listed Building); and***
- ***Iona (Conservation Area)***

The statement that there are "no physical impacts to designated terrestrial heritage assets" relies on a narrow definition of harm that contradicts Scottish planning frameworks. In Scotland, an asset does not need to suffer physical destruction to experience harm; impacts on its setting and cultural context are equally significant. While the physical structures on Iona remain untouched, the setting of these heritage assets will be substantially impacted.

The applicant acknowledges that moderate to major changes will take place, yet relies on the application of English legal principles to justify these impacts within a Scottish jurisdiction.

What follows is the applicant's list of affected designated assets. The table fails to reflect the true historical significance of the Iona assets, which are relegated to the bottom despite being foundational to Western cultural development across Scotland, Britain, and Europe. Just as Stonehenge would rarely be positioned last in such a context, Iona's paramount importance in the historical narrative demands greater, and appropriate, recognition.

The applicant's list is fundamentally disrespectful. It appears to be based on a *'quantifiable'* criterion (applicant's terminology) - distance from the development. If the historical and 'cultural' examination had been carried out thoroughly with that *'knowledge and experience'* (as per the HES EIA handbook) of the designated settings and the island 'as a whole' rather than as a compartmentalised citation, the EIAR technical summary might more appropriately have stated:

1a
Changes to the setting of designated heritage assets, and their context, of National, British, Irish and European importance.

- **St Mary's Abbey (Scheduled Monument), Iona Abbey (Listed Building), Iona (Conservation Area) and the island of Iona as a monastic settlement.**

1b
Changes to the setting of designated heritage assets, and their context, of National importance.

- Dubh Artach Lighthouse (Listed Building);
- Oronsay Priory and Cross (Scheduled Monument);
- Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);
- Dun Bheolain, fort, Islay (Scheduled Monument);

By contrast, the applicant has dedicated just one paragraph, Paragraph 180, in the technical summary to the heritage assets, and their context, of Iona. In doing so, the applicant has failed to acknowledge the fundamental importance of Iona and its heritage assets to Western culture.

Furthermore, the Iona Abbey and its context is entirely underplayed in a startling statement from the applicant's EIAR:

6.2.1 Iona Abbey (L12310)
*In terms of the effects on the Category A listed building Iona Abbey (LB12310), these are assessed the same as the corresponding SM (see Section 1.6.1.5), while the **Abbey church** would remain the dominant element in all views of the asset and would very much retain its imposing physical and spiritual presence in the asset group, the juxtaposition of turbines with the asset **would detract to a degree.** Therefore, the magnitude of change is assessed as low adverse, resulting in a moderate adverse significance of effect, which is significant in EIA terms.*

roughout the EIAR the applicant states that the turbine arrays will be visible and provides evidence of this visibility by way of imagery in the Appendix 4 (SLVIA) and Chapter 14.3 Settings Assessment, Appendix 14.3. Given the historic significance of the setting, they state that the turbine development uld **detract** but **'to a degree',** inferring that the 'degree' is minimal – an incorrect conclusion that is repeated throughout the documentation. contrast, all the applicant's submitted images demonstrate an all-pervading presence of the turbine development. To state that they 'detract to a gree' thereby inferring that 'degree is minimal, is not accurate. These static photo images of the turbines do not convey what the eye will see in reality. e eye sees objects in much greater detail than these images portray and therefore in reality, the wind turbines will appear much more visible that as rtrayed (some of the turbines are even blurred in the imagery). Furthermore, these images do not convey the reality that these turbines will be nstantly mechanically moving – further highlighting the physical intrusion on a currently empty horizon.

tting aside, for a moment, the paucity of the historical examination of the applicant's EIAR, the *Matrix For Evaluating The Significance Of An Effect* Table (pt 77 of the Technical Summary) indicates ***'low adverse'*** change by the development on Iona heritage assets which is inaccurate and we challenge t assessment. Photographs in the EIAR are a useful measure of the extent of visual impact - albeit they are not in a worst case scenario because in me of the imagery, the turbines are blurred whereas in reality they may be seen with crystal clarity.

e EIAR in juxtaposed foreground/ background views, deems and interprets the historical asset, the Abbey, as diverting a viewer's attention away from e backdrop of the turbine development such that the adverse impact will not be noticeable. However, HES states that it is necessary to take into count *'knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or nilar places – life experience'* and in the case of the Abbey and the Island of Iona, that is the knowledge that the place is an ancient spiritual place unded by St Columba, the birthplace of Christianity in Scotland, set in splendid isolation against empty horizons. With that 'knowledge,' the perceived verse impact on the Abbey and Iona wrought by the occupation of a vast industrial development, constantly in motion, on those empty but splendent horizons **will in fact be intensified.** Therefore, in this context, **the adverse impact is** not 'low' but **'high'.**

comparative analysis of heritage settings demonstrates this principle. Consider a theoretical scenario involving a proposed wind energy development uated 12 miles from a monument of immense historical importance, such as Stonehenge. The juxtaposition of this ancient Neolithic monument with a st array of modern industrial infrastructure would create a severe visual clash.

cause cultural context profoundly influences visual perception, the introduction of industrial-scale development within the setting of an anchoring tional monument would result in an unacceptable adverse visual impact. Therefore, assigning a "low" visual significance score to such a proposal would l to recognise the fundamental incompatibility between modern utility structures and iconic heritage assets.

ewise, the Abbey and its setting of Iona are of National, British and European significance and enjoy worldwide interest. So here we would have other pre-industrial setting of huge significance (Iona an anchoring monument of Britain's and the national historical timeline as with Stonehenge) set ainst a modern utility seen as a horizon of dynamic steel turbines. Therefore the applicant's adverse magnitude score for just the scheduled onument, Iona Abbey and Iona Conservation Area in their *Matrix For Evaluating The Significance Of An Effect* Table 5.1 of 'low adverse magnitude' is ational.

We believe that the EIAR should include an assessment of the **whole of Iona as well as the scheduled Monument, Iona Abbey and Iona Conservation Area.** Given the National, British and European historical and cultural importance of Iona and its Abbey we believe that such an assessment is reasonable and appropriate and that the adverse magnitude score is likely to be a **'high adverse magnitude'.**

Put it the other way, if Iona Community Council had been carrying out the EIAR, with our deep 'knowledge' we would have started with an adverse magnitude score of 'high adverse impact'. So, what would bring that score down to a 'low adverse impact' when it is, as HES state, *'knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or similar places – life experience'* that affect the perceived adverse impact? Nothing can bring that score down.

The adverse magnitude score for *Matrix For Evaluating The Significance Of An Effect* Table 5.1 is very important. A 'low adverse impact' taken together with a 'high' sensitivity results in a 'moderate' significance of effect (technical summary 77. Table 5.1) which allows the applicant to state in that point of the summary that ***'...in general, effects which are of major or moderate significance are considered to be significant in EIA terms, although it is possible that a conclusion of moderate effect significance may not be considered significant'.***

Simply assessing the adverse magnitude score as 'medium adverse impact' in Table 5.1 makes the significance of effect 'major,' in which case there is **no opportunity to change the significance of effect.**

If, as we believe, the adverse magnitude score in Table 5.1 was **'high adverse impact' makes the significance of effect 'major' and there is no opportunity to change the significance of effect.**

What this means is that by carrying out an inadequate assessment which fails to assess the whole of Iona and additionally fails to correctly assess the scheduled Monument, Iona Abbey and Iona Conservation Area in accordance with HES, the applicant's EIAR underscores and then dilutes the significance of the adverse impact to the point where the irrational conclusion is in 1.6.2.3.5 (332-333):

> *The focus of the CA is St. Mary's Abbey and while the WTGs would be visible as a background element of views of it, it would remain the visually dominant focal point of views.*
>
> *The presence of the WTGs in the distant seascape would not detract from those aspects key outlined in Section 1.6.3.1.1 which contribute to its cultural significance.*
> *As a result, distant visibility of the WTGs, the change to setting would be of* ***low adverse magnitude*** *which for an asset of high importance* ***will give rise to a moderate adverse effect to cultural significance which would be significant in EIA terms.***

The significance of the heritage assets have been known about as far back as the ***2013 Strategic Environmental Assessment (SEA) of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters.***

In this 2013 document, under the site designation reference OWW1 (roughly equating with the current Machair Windfarm) it identified under Historic Environment, Impact on Setting of Historic Environment as being of a ***medium risk.***

that report thought it important to specifically highlight two historic settings: Skerryvore Light House, Tiree and Iona Abbey:

6.7.47 The region contains features of historic interest, including designated coastal sites such as Skerryvore Lighthouse in Tiree and ***Iona Abbey.***

ummary of SEA recommendations, it advised under Table 6.4: Assessment of the Plans against SEA Objectives:

To avoid adverse effects on the character and setting of historic sites and buildings.

pecifically on this point, SEA recommendations stated:

It identified ***historic features to avoid at the project level,*** *recommending the* ***avoidance of significant effects on key features of the historic ment in the siting of offshore developments.***

rising the documents position 7.2.6 on *Historic Environment*, concern for the heritage assets are amplified:

However, there are also more generic effects relating to ***potential impacts on the setting of historic features*** *and undesignated marine features, such as some wrecks. The following mitigation has therefore been identified.*

Project level assessments should consider the ***potential impacts on the setting of sites and seek to mitigate accordingly to minimise any such effects.***

3 Regional Recommendations for Draft Plan Options, West 7.3.21, confirms the role of the EIA process in relation to the historic environment:

7.3.21 The region contains many designated coastal features of importance to the historic environment. **The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised.**

thirteen years ago, it was clear that **Iona's heritage assets and their island context,** was a significant issue. It was clear in the SEA of 2013 that impacts were to be avoided or minimised with specific reference to Iona Abbey and, by implication, its context.

ely, the EIAR's conclusions underestimate the overall visual impact because the underlying assessment relies on a limited historical analysis oritizes static photomontages over the dynamic, lived reality of human visual perception in this landscape.

st that placing towering industrial machinery in the backdrop of one of Western Europe's oldest and most sacred island landscapes will diminish ltural and spiritual significance only "to a degree" is a fallacy that fails both EIA standards and common sense.

icant's conclusions of a 'low adverse magnitude' ignores the relentless, industrial motion of massive offshore turbines that will irrefutably draw and irrevocably alter the resplendent emptiness of the historic Atlantic horizon. To conclude in the applicant's *Matrix For Evaluating The nce Of An Effect (Table 5.1)* that the significance of effect will be *'**moderate** adverse'* when no mitigation has been carried out is irrational.

The *2013 SEA of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters,* remains the primary advisory framework and yet the applicant has failed to address its stated concerns with regard to *the* ***'avoidance of significant effects on key features of the historic environment in the siting of offshore developments'*** and if any are found ***'to mitigate accordingly to minimise any such effects'.***

The 2013 SEA stated clearly that it was incumbent on the EIA for each project that the ***'The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised'.*** This resulting Machair Windfarm EIA has singularly failed to show how adverse effects have been avoided, minimised or in any way mitigated. The fact is, they can't be.

18. CONCLUSION

In conclusion, there is no mitigation that can lessen the wholly unnecessary adverse impacts on the heritage assets and their context, short of not building the development in this location.

The 20 or so page Appendix 14.3 response to HES questions on the '*knowledge*' of Iona's 1500-year history skims the surface of Iona's deep legacy to our Scottish culture given the thousands of pages in the submission. In the final Chapter 7 of the Planning Statement under 'Planning Balance and Conclusions', Jura is mentioned four times and Colonsay once. Iona is not mentioned at all.

There is a disconnect between the depth of known history of Iona and how it is sketchily summarised by the applicant and interpreted in the EIAR as summed up in final paragraph of the applicant text on the Iona Abbey setting, which is repeated here.

> *While the WTGs would be visible on the horizon in views back towards Ireland, as Ireland cannot be seen from Iona, this view is a symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified.*

The EIAR on the Abbey ends with a trivialising of an entire cultural understanding of the root of Western Christianity on this coastline and a secular demand for quantifiable criteria, when in fact the EIA handbook clearly states that other factors, '*knowledge*' and '*experience*' need to be taken into account.

There is however one clearly quantifiable observation that can be drawn and which should be a significant factor in the determination of this planning application: amidst all the off-shore windfarms being built off Scotland;

There is only ONE IONA.

.

Objection 03-09-26

ADDENDUM to OBJECTION 23-07-26:

Material Changes in Strategic Environmental Assessment Framework

During the initial consultation period, I was unaware that an updated draft **Strategic Environmental Assessment (SEA)** had been released in 2025. This document appears to have been renamed as a **Strategic Environmental Impact Assessment (SEIA)** to reflect a planned merging of assessment protocols.

A subsequent review of the **Draft SEIA 2025** reveals critical omissions:

- **Removal of Key Assets: Iona Abbey** and **Skerryvore Lighthouse** have been entirely removed from the main text of the West Coast regional assessment.
- **Reduction to a Single Viewpoint:** The ~~Abbey~~ IONA FERRY is now only referenced in the 'W1' spreadsheet. Crucially, this entry does not acknowledge the holistic historical or cultural importance of the Abbey, but narrows its significance down to a single, specific viewpoint from **Fionnphort**.

This omission and subsequent relegation of a globally significant heritage asset to a solitary "framed viewpoint" is a deeply concerning shift. The historical importance and world standing of **Iona** have not diminished over the last 12 years. Yet, the draft SEIA 2025 effectively undermines its status without offering any qualification or justification.

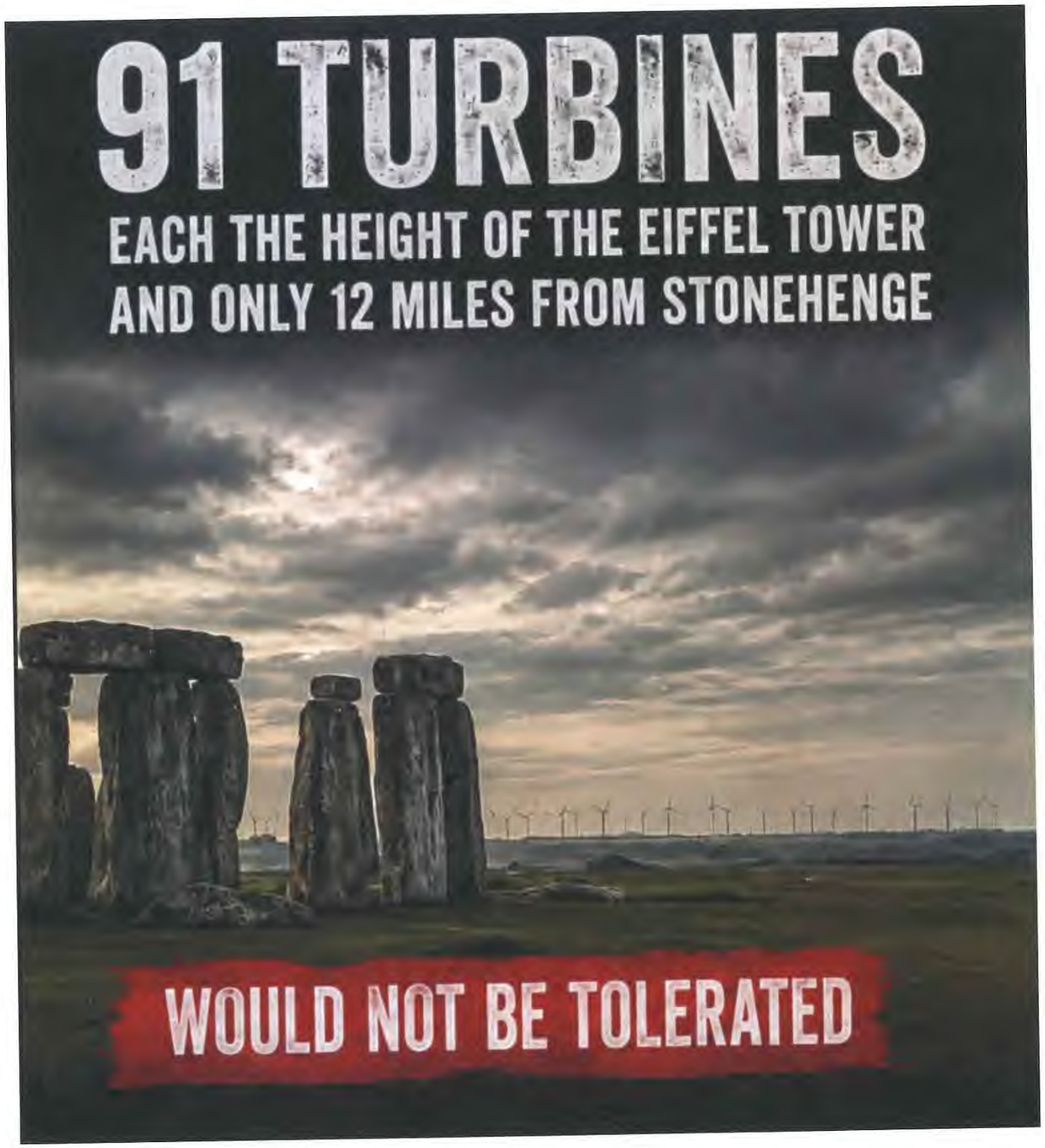
Of greater concern is that this diminished framework appears to form the foundation of the current application. Rather than adopting the "whole island" assessment approach implied in the **Draft SEA 2013**—and advocated for in this objection—the applicant's **Environmental Impact Assessment Report (EIAR)** relies on this restricted 2025 frame of reference. As a direct result, the application significantly undervalues Iona's asset worth to Scotland.

Regardless of this problematic evolution from the 2013 draft to the 2025 draft, the physical and cultural reality of **Iona Abbey** remains unchanged. It is an internationally significant setting. Before the draft SEIA 2025 is formally approved, this shift in emphasis must be investigated and corrected, as it has clearly misguided the applicant's assessment of the island's heritage value.

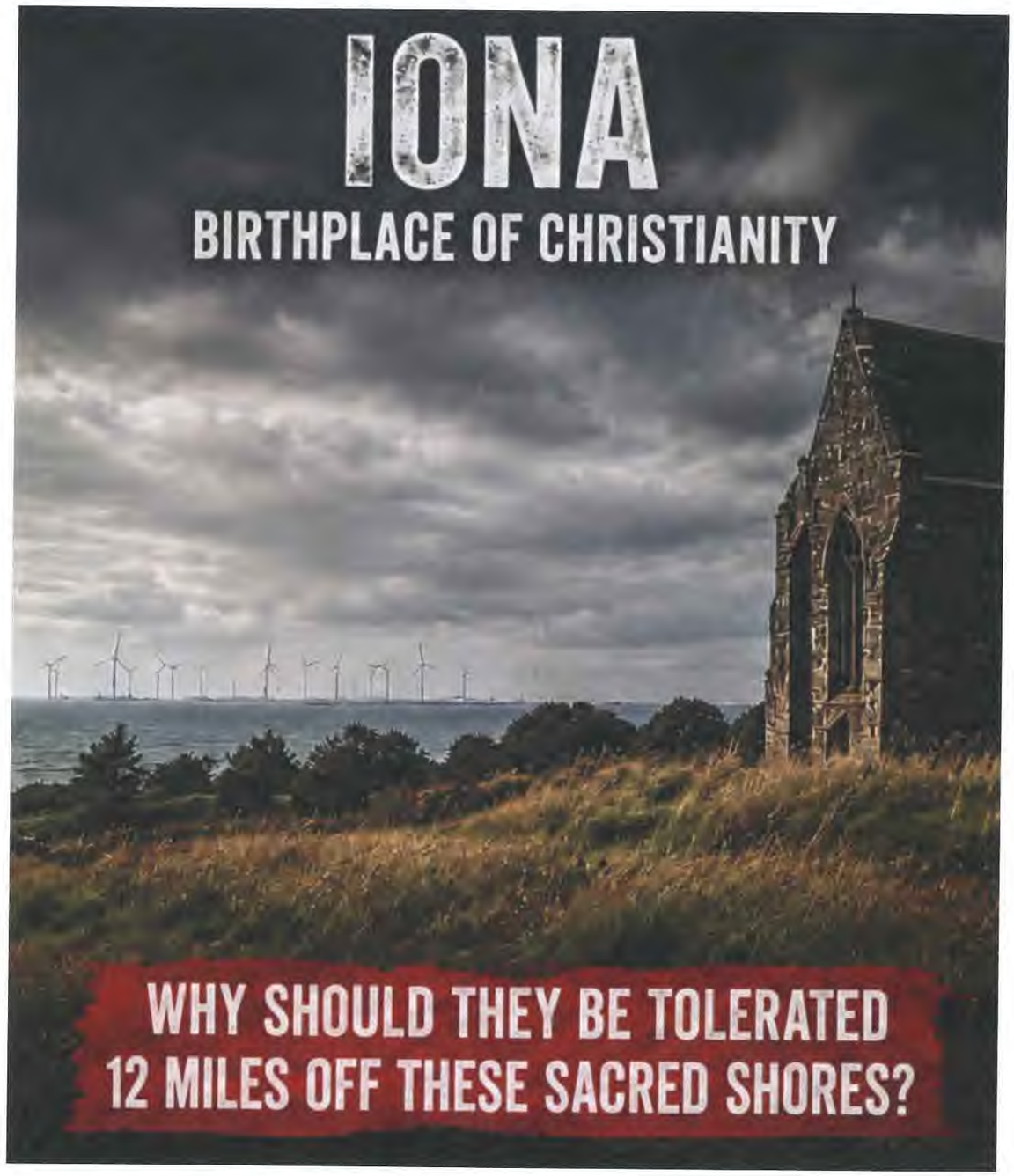
Consequently, these findings reinforce the conclusion of the original objection: the proposed development will cause wholly unnecessary, adverse impacts on these vital heritage assets and their contexts. No mitigation measures can lessen this impact, short of refusing development in this location.

llowing illustration is an AI-assisted alisation (generated via ChatGPT). an application simulation looking d Iona Abbey as a baseline, a arable view was requested for henge. This serves to demonstrate a parallel: such a development would emed entirely untenable at henge, and it is equally untenable

513


91 TURBINES
EACH THE HEIGHT OF THE EIFFEL TOWER
AND ONLY 12 MILES FROM STONEHENGE
WOULD NOT BE TOLERATED

ONE IONA


IONA
BIRTHPLACE OF CHRISTIANITY
WHY SHOULD THEY BE TOLERATED
12 MILES OFF THESE SACRED SHORES?

c Consultation

July/Aug

When the exchange's October timeline proved too late for the summer Maritime Directive campaign, a grassroots road tour emerged as our new path forward.

This journey began through a series of fortunate events sparked by [Redacted] during her master's studies at the Glasgow School of Art. As part of her coursework, she organized the *Island Expressions* exhibition at Oban's Sadie Hall, bringing together 26 creators from 12 islands. Wanting to support a student project, I attended the event and the concept of our road trip was born.

.




Only seven days to go before the de...

[Redacted]

via Change.org

Yesterday

To You

change.org

[Redacted] shared an update on *Please support our Hebridean islands: say no to MachairWind*. Check it out and share with others:

Petition Update

Only seven days to go

HOW TO OBJECT →

Blog

Tobermory Artist, [Redacted]

hebrideanhorizon.co.uk

On the Road





Bunessan Show



In late June, the developers submitted a massive planning application with a tight August objection deadline. In response, Jane and I reviewed the documentation, attended a tense Community Council meeting, and coordinated with the local Iona representative to unify our protests. Our digital painting was quickly adopted by the Hebridean Horizon campaign who made a film about it (by [Redacted] with composer and musician [Redacted] and [Redacted]) and the protest painting was soon invited to the Bunessan Show as a backdrop for the Iona protest table.

With the large canvases strapped to the roof of our Mini and its wooden stands packed inside, we took to the road. This journey deeply rekindled memories of my own student years in the 1970s, scooting around the city in a friend's minivan loaded with project models, participating in sit-ins, and boycotting lectures in a passionate demand for change.

That era of artistic anger was epitomised by Joseph Beuys, an artist equivalent in status to Warhol but focused strictly on social and political critique rather than popular culture.

At the Bunessan Show, I met the artist Brian Thomas, who lived just across the road from the showgrounds. Once the stands were packed away and the painting was secured back on the roof, he invited us into his home. Stepping into his house felt like entering his mind; every carving, print, sketchbook, and tool was perfectly placed, representing a deeply personal value system.

Brian is a true child of late-sixties and seventies activism who views art as an action—a physical synthesis of craft and social thought. In his library, I spotted the book *Joseph Beuys in America*, the exact text from which Beuys's radical quotes are taken and in which his famous 1969 installation, *The Pack*, is described.





520

Social Sculpture

As we had driven toward Bunessan, *The Pack* had resonated deeply in my mind. The sculpture, a piece of environmental art, is a stalled VW van disgorging sledges equipped with survival fat, felt, and torchlights. It was Beuys's critique of modern technology's failure. He called it an "*emergency object",* noting that in a crisis, conventional vehicles are useless, demanding more primitive means to ensure survival.

In the 1960s, Beuys investigated this social agenda through what he called *"a social organism as a work of art",* leading to his concept of *"Social Sculpture".*

By the 1970s, he pursued active solutions through his Celtic "Road Trip" projects across Scotland and Ireland alongside gallerist Richard Demarco, seeking ancient belief systems capable of challenging the overwhelming rationalism of modern life.

This same hyper-rational, industrial force now threatens Iona. Beuys elaborated that commerce and the state perpetuated the status quo through their power over resources, famously stating his mission was to radically change the money system and the oppressive interaction between these blocks.

He advocated a different path by co-founding the Organization for Direct Democracy, the Free International University, and eventually, the West German Green Party to argue for individuals subject to these powers.

Joseph Beuys

ssion Before: *Joseph Beuys, Art Papier, 1974*

s, perhaps I have a mission... to change the social order. To change the oney system mostly, that's the most important thing, the money stem. Money and the state are the only oppressive powers in the esent time. Money and the state and the [interaction] between these ocks. There is no other power and as long as people go to vote and go the polling booths and say yes, yes, yes, to this system, as long this stem will survive. And so we go radically another way and push against is. Radically.

litics After: *Joseph Beuys, by Caroline Tisdall (published by Thames & Hudson), 1979.*

nat first period was called the Organisation for Direct Democracy. In 971, I transformed the organisation into the Free International niversity, and two years ago I was a co-founder of the Green lovement, and later a co-founder of the political party the Greens. So, nen one has a simple image of what is already organised in a way that it oes not have to be produced from scratch.

521

How ironic it is, then, that the individuals arguing for Iona and its neighbouring islands as a green and spiritual oasis should now find themselves up against commercial energy acting on a vast scale with state support, ostensibly driven by a green agenda.

What would Beuys have thought?

A friend seeing the image of *The Pack* sent me a picture of the transformative Fordson tractor, an innovation that revolutionised agriculture by enabling power to move on the land.

Yet, paradoxes abound. Just as the VW van had stalled in Beuys's sculpture, history reveals that the Fordson tractor was ultimately used not just to work the land, but to tow bombs to Lancaster Bombers for night flights over Beuys's homeland.

Today, a similar contradiction unfolds: Iona's proposed windfarm is deemed all to the good for energy commerce elsewhere, while leaving the local seabed and surrounding islands to carry the devastating spiritual damage and environmental cost.

Paradox





523

E IONA

ust/Se

M MD.MarineRenewables@gov.scot

To: You [Redacted]

Wednesday 2 September, 16:10

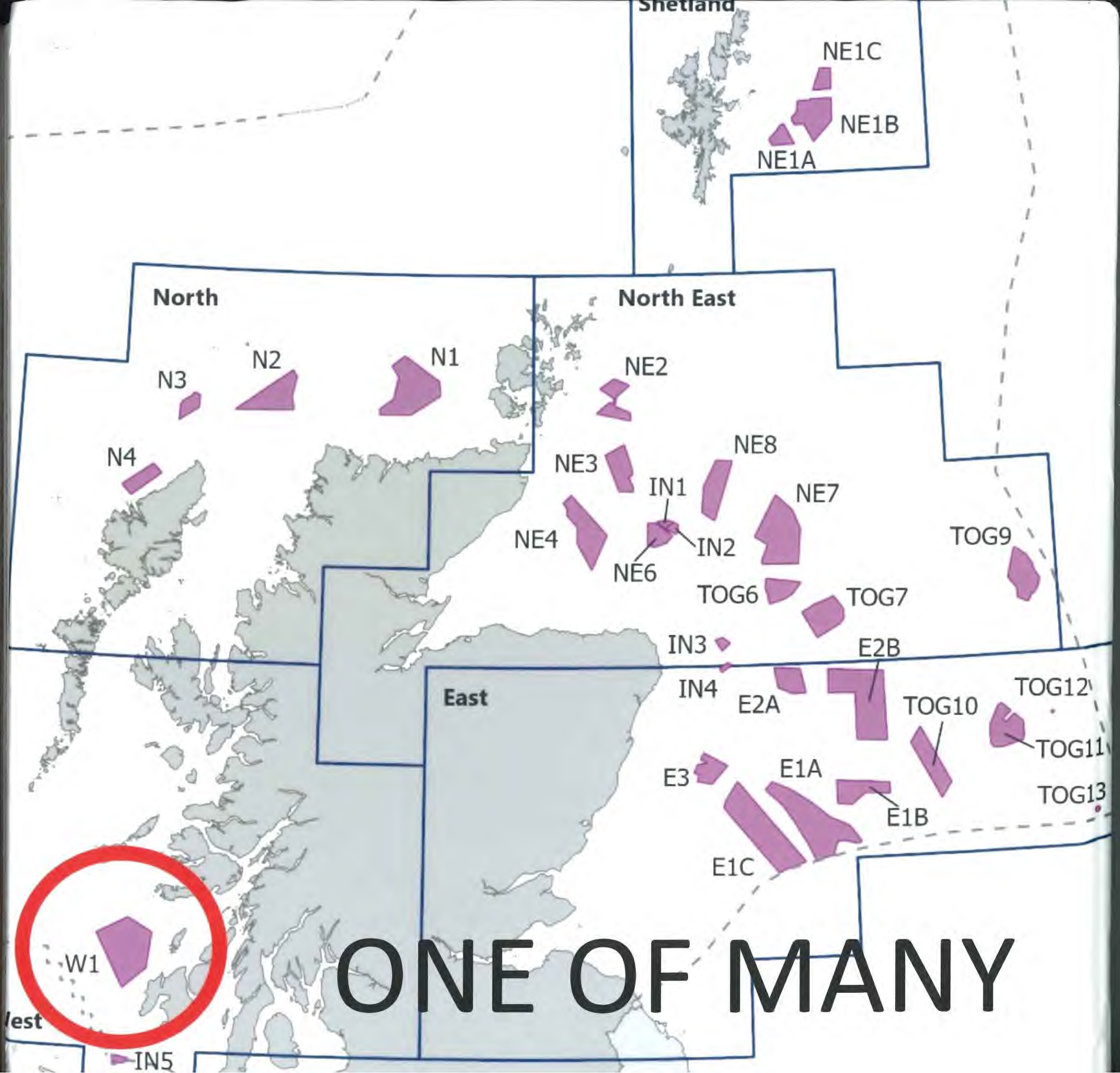
Good Afternoon,

Thank you for your email. The latest we can grant an extension to would be 30th September. Unfortunately we are unable to offer an extension that is contingent on another consultation response.

Please do let us know if the 30th September would be suitable?

Kind regards,

Marine Directorate - Licensing Operations


Shetland
NE1C
NE1B
NE1A
North
North East
N1
N2
N3
N4
NE2
NE3
NE8
IN1
NE7
NE4
NE6
IN2
TOG9
TOG6
TOG7
IN3
E2B
IN4
E2A
East
TOG10
TOG12
TOG11
E3
E1A
TOG13
E1B
E1C
W1
IN5

ONE OF MANY

Member of the Public 5006

From: [Redacted]
To: MD Marine Renewables
Subject: Machair Wind farm
Date: 27 July 2026 17:03:21

I am writing to object in the strongest terms to the Machair wind farm proposed in the Inner Hebrides.
This wind farm represents an appalling attempt to profit from industrialisation of one of the most important and scenic landscapes in Scotland and indeed the world .The marine environment surrounding these islands and the bird life it supports are internationally important .
The islands pristine beaches , uninterrupted views to the Atlantic and the cultural and religious significance of places like Iona needs to be protected for future generations not destroyed .
The Hebridean landscape is truly one of the wonders of our world .
Scotland already produces more renewable energy than it can use and taxpayers pay to turn off the power from the existing turbines .
Wales where the energy from this proposed wind farm is to go also produces more energy than it can use .
The islands depend on Tourism and visitors come to see a pristine wild environment with amazing views . In a world where bird and marine species are disappearing at an alarming rate this represents vandalism on an unprecedented scale .
This wind farm is much closer to shore than other offshore wind farms and the turbines covering an area half the size of Mull at 340 metres will be taller than any building in Europe .This will destroy the views from multiple islands .
Yours sincerely
Dr [Redacted]

Sent from my iPhone

Member of the Public 5007

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	machair wind farm
Date:	15 August 2026 11:52:13

I hope this includes Marine Directorate. I wish to protest about the Machair Wind farm . Firstly: We do not have the infrastructure to cope with the amount of electricity that would be generated.

. Our government, we taxpayers, would have to pay the Spanish owned Scottish Power Renewables billions to not use the turbines.

. It's the largest wind farm in Europe by far. It's not necessary.

. The turbines are higher by far than Carsaig cliffs.

. The people of Colonsay on the west coast will never see a sunset when they are constructed.

. The visual impact on neighbouring islands such as Iona , Islay, Tiree, will be horribly awesome. A crime really, and affect tourism and wildlife.

. The wildlife such as puffins on the The Treshnish islands, basking sharks, dolphins will all be affected.

. Businesses will be affected, tours to the islands, fishing.

. It's not as if there will be any great benefit to the islands affected or wildlife.

. The energy goes south and away.

Sounds to me like a 'Parcel of Rogues 'is being played out here.

Concerned

[Redacted]

Member of the Public 5008

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Machair Wind Farm
Date:	15 August 2026 21:57:33

To whom it may concern

I am writing to express my concerns about the Machair Windfarm Development

I live on the Isle of jura which won't be as significantly affected visually are some other island locations in this archipelago. Personally I have no real objection to the presence of wind turbines either in the landscape or the Seascape and they do not disturb me aesthetically; indeed I'm very familiar with looking out at the huge turbines visible from Amager Strand in Copenhagen.

My concerns have more to do with the disruption to the seabed by the construction project of all of these turbines the huge quantities of concrete and Steel that will be involved in order to fix them permanently. From friends and colleagues in Norway in particular in Stavanger, I'm aware of other wind turbine tech technologies that are in use in the north sea based around movable flotilla of vertically rotating turbines in particular.

In order to meet the challenge of our energy needs in the future we need not only to look at generation of power but also the nature of our consumption. As someone with four adult children and several grandchildren I have a big stake in the future. I have spent my life opposed to the escalation of fossil fuel use and to the introduction of nuclear power as an alternative. Having gone through a difficult and challenging process in installing a heat pump system in a 150 year-old Scottish property that is my home I have come up against the need to insulate homes in a very real way. Indeed, if we hope to manage the heating and cooling of our homes in the future then we need to look much more closely at issues like insulation and the construction of buildings rather than merely generating more and more electricity.

We have seen in Scotland how supposedly Green energy projects have been put in place mainly to swell the coffers of large wealthy players: corporations and land owners. Jura itself has seen the creation of a hydro scheme that passes no benefit whatsoever to the Community in return for the desecration of landscape and rivers, alongside the detrimental effects to our transport infrastructure generated during the construction of such projects. Generating electricity in Scotland to meet the needs in particular of England is something that should not be forced upon communities unless they are to benefit significantly. I don't see sufficient evidence of this in the project being outlined.

We have seen in our area right wing opposition to this project that is centred around the polemic of climate denial and interests that seek to prolong the use of fossil fuels and the expansion of oil extraction into the future which will do nothing except desecrate our planet. I do not align with those views.

My concern about this project is that it does not actually answer the needs we face in the future and that it is not being conceived in a way that will benefit the communities in which it is being situated. Solving our future energy problems will come from the reduction of energy use, more efficient homes, more efficient transportation, more environmentally friendly food production and a very cautious approach to the adoption of new technologies such as AI, which will place huge demands on our electricity supplies and the rollout of which has not been anticipated in the energy planning that has taken place over the last 20 years.

I hope you will take note of this summary of my concerns and consider consider the points that I have made in your review of this proposal and in the conditions that you place on it should you decide to grant it permission to go ahead.

Your sincerely,

[Redacted]

www.exchangeart.co.uk
www.worldorgan.com

Member of the Public 5009

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	Objection to the Planning Application for MachairWind Offshore Wind Farm
Date:	02 August 2026 16:27:11

Date: 2 August 2026

[Redacted]

To: Scottish Ministers (Marine Scotland – Marine Directorate)
MD.MarineRenewables@gov.scot

Subject: Objection to the Planning Application for MachairWind Offshore Wind Farm

Dear Sir / Madam,

I am writing to formally object to the planning application for the MachairWind Offshore Wind Farm development due to its potential impacts on internationally and nationally protected marine environments surrounding Iona, Mull, Colonsay, Islay and the wider Inner Hebrides.

Whilst I support the rapid transition to renewable energy, I consider the proposed site of this development is ill conceived and is likely to bring long lasting and irreparable damage to the marine environment, local communities and tourism businesses operating in the area.

I submit this objection as both a legal professional and a nature writer with a longstanding interest in Scotland's marine environment. I am also a frequent visitor to the islands of the Inner Hebrides, including Tiree, Coll, Mull, Iona, Staffa and the Treshnish Isles, and have spent considerable time exploring and observing the exceptional wildlife and landscapes of this region.

Through these visits, I have developed a deep appreciation of the ecological importance of the Hebridean marine environment and the interconnected network of protected habitats and species that make this area one of the most significant marine ecosystems in Europe. The opportunity to observe seabirds, cetaceans, seals and other marine wildlife in their natural environment has reinforced my understanding of the conservation value of these waters and the importance of protecting them for future generations.

My objection is not based on opposition to renewable energy. I recognise the urgent need to transition to a low-carbon economy. However, I consider this

transition must be delivered in accordance with the law and without compromising internationally and nationally protected habitats and species.

I am conscious that Scotland's environmental legislation is founded on the principle that irreplaceable natural assets should be protected where there is scientific uncertainty regarding potential harm. The Conservation of Habitats and Species Regulations 2017 and the Marine (Scotland) Act 2010, and other environmental protections impose clear legal duties on decision-makers to ensure that developments do not adversely affect the integrity of protected sites or the conservation status of protected species.

Accordingly, this objection is made in the public interest. It is not an objection to offshore wind development in principle, but a request that this proposal be rigorously assessed against the legal and scientific standards required by Scottish and international environmental law. In my view, the exceptional ecological significance of the waters surrounding the proposed development, together with the presence of numerous protected habitats and species, requires the highest level of scrutiny. Where reasonable scientific doubt remains as to the potential for adverse effects, the precautionary principle should be applied and consent should not be granted.

The following representations set out my concerns regarding the proximity of the proposed development to protected marine sites, the ecological connectivity of the wider Hebridean Sea, and the potential impacts on protected species, including harbour porpoises, minke whales, other cetaceans, basking sharks, seals and seabirds.

Although the proposed wind farm does not directly overlap designated conservation sites, it is located within an ecologically connected marine environment containing numerous protected areas. Marine mammals, seabirds, migratory fish and benthic habitats do not recognise administrative boundaries, and impacts from offshore construction, operation, vessel traffic, underwater noise and habitat disturbance may extend well beyond the footprint of the development. Further, the qualifying species for many of these designations routinely travel far beyond those boundaries to feed, breed and migrate. Consequently, the ecological connectivity between the proposed wind farm and surrounding protected areas is a key consideration under the Conservation of Habitats and Species Regulations 2017.

The proposed site lies adjacent to or within the ecological influence of several protected sites, including:

Iona Site of Special Scientific Interest (SSSI)

Iona is designated for its exceptional geological and biological importance and the island supports species-rich machair grassland, rare plant and breeding birds including the corncrake. Corncrakes are protected under Schedule 1 of the Wildlife and Countryside Act 1981 and is on the UK red list as a species of high conservation concern. Little is known about the migratory habits of the corncrake. Migration takes place at night, making them very vunerable to collision with the turbines in the proposed development. The Inner Hebrides is a significant breeding site for corncrakes, with Tiree hosting a third of the entire UK population. A population which has been in decline over the last 10 years and which is likely to decline further due to the risk death caused by collision with turbines at the proposed site.

Inner Hebrides and the Minches Special Area of Conservation (SAC)

The western boundary of the ScotWind W1 Plan Option lies adjacent to the Inner Hebrides and the Minches SAC, which has been designated specifically for

harbour porpoise because it supports one of Europe's most significant populations. Harbour porpoises are highly sensitive to underwater construction noise, piling, increased vessel movements and changes in prey availability. Harbour porpoises frequently travel well outside the designated SAC boundaries, meaning that activities within the proposed development area are likely to affect animals in the SAC. The Scottish Government's Sectoral Marine Plan identifies the W1 area as bordering this SAC, meaning any development must demonstrate beyond reasonable scientific doubt that it will not adversely affect the integrity of this internationally important site.

Firth of Lorn Special Area of Conservation

Approximately 34 km from the proposed development lies the Firth of Lorn SAC, designated for internationally important reef habitats that support rich marine biodiversity. These reefs provide habitat for numerous fish and invertebrate species and contribute to the wider ecological health of Scotland's west coast. The developer identifies this SAC as one of the nearest designated marine habitats.

Changes to sediment transport, water quality and marine disturbance are likely to effect ecological processes extending beyond proposed developments boundaries.

Treshnish Isles Special Protected Area and Site of Special Scientific Interest

Located approximately 38 km from the development area. The Treshnish Isles is one of Scotland's internationally important seabird colonies and species nesting there include Atlantic puffin, storm petrel, barnacle geese, guillemot, razorbill and kittiwake.

Many of these birds regularly travel between 40 and over 100 km from their nesting sites in search of food. Therefore their foraging ranges will overlap with the proposed development and potential impacts include:

- death from collision;
- disruption to migration;
- displacement from feeding grounds and reduction of available prey due to disturbance of the seabed;
- reduced breeding success due to increased foraging distances and availability of prey;
- cumulative impacts alongside other offshore developments.

The Treshnish Isles are a popular eco-tourism destination for for operators from Mull, Oban and Tiree as well as larger cruise operators. The proposed development is likely to affect such businesses, both with its visual impact and further declines in an already fragile Scottish seabird population that is still trying to recover from the affects of avian flu.

Treshnish Isles Special Area of Conservation (SAC)

The Treshnish Isles are also designated because of their reef systems which support, sponges, soft corals, sea squirts, kelp communities and commercial fish nursery areas

Healthy reef ecosystems underpin wider marine biodiversity across the Inner Hebrides.

Many of the fish species in this area are commercially important, so not only is the proposed development likey to affect its biodiversity, but also be harmful to local fisheries.

Staffa Special Protection Area (SPA)

Staffa was designated because of its population of breeding European storm petrels which are particularly vulnerable from the proposed development because they:

- feed offshore at night;
- depend upon predictable feeding grounds;
- have low reproductive rates.

They are internationally protected because of declining populations.

Any increase in disturbance or changes in marine food availability is likely to reduce breeding success**.** They are also at risk from collision and the illumination of the proposed turbines at night is likely to interfere with their feeding habits.

Stanton Banks Special Area of Conservation

Approximately 47 km from the site, Stanton Banks SAC protects reef habitats that form part of the wider interconnected marine ecosystem of the Inner Hebrides.

Loch Sunart to the Sound of Jura Nature Conservation Marine Protected Area

This Marine Protected Area protects flame shell beds, northern featherstar communities, serpulid reef aggregations and flapper skate. These are among Scotland’s most vulnerable marine habitats and species, many of which are highly sensitive to seabed disturbance, sediment movement and changes in water quality.

Many of these habitats take decades or centuries to recover from physical disturbance.

Flapper skate are one of the most threatened fish species in north-west Europe and are extremely sensitive to habitat degradation.

Loch Sween Nature Conservation Marine Protected Area

This protected area conserves maerl beds, native oysters, burrowed mud habitats and subtidal sediment communities. These habitats are recognised as nationally important because they develop over centuries and are exceptionally vulnerable to disturbance. Maerl grows only a few millimetres each year. Damage caused by sedimentation or seabed disturbance may persist for centuries.

Native oysters are already one of the UK’s most threatened marine species.

The Sea of the Hebrides Marine Protected Area

This area has been designated for the protection of basking shark and minke whales.

The basking shark is the world’s second-largest fish and is listed as Endangered on the International Union for Conservation of Nature (IUCN) Red List. It is a

protected species in Scottish waters under the Wildlife and Countryside Act 1981, and Scotland has international responsibilities for its conservation because its west coast supports one of the largest seasonal aggregations in Europe.

The waters around Coll, Tiree, Mull, Iona and the wider Inner Hebrides are internationally recognised as important feeding habitat for basking sharks and minke whales during the spring and summer months.

Basking sharks

This species feeds by filtering plankton from surface waters and often follows predictable oceanographic features, including tidal fronts and areas where plankton becomes concentrated. These productive feeding grounds are an important reason why large numbers of basking sharks return to Scotland's west coast each year.

Satellite tracking has demonstrated that basking sharks travel widely throughout the Hebridean Sea, meaning individuals regularly move through waters that could be influenced by the proposed development.

Minke whales

Minke whales migrate into the Hebridean Sea each year to exploit highly productive feeding grounds where tidal currents and underwater topography concentrate shoals of fish such as sandeel, herring, sprat and juvenile mackerel. These productive feeding areas occur across a wide geographic area and are not confined to the boundaries of designated Marine Protected Areas. Individual whales routinely travel tens of kilometres in a single day while searching for prey, moving freely between protected and non-protected waters.

The potential impacts associated with the construction and operation of a large offshore wind farm include:

- Increased vessel traffic during construction and maintenance, increasing the risk of boat strike.
- Underwater construction noise that is likely to alter behaviour or displace sharks and whales from preferred feeding areas.
- Changes to local hydrodynamics that could influence plankton distribution and reduce the quality of important feeding habitat.
- Disturbance associated with cable installation, seabed preparation and other construction activities.
- Changes and potential reductions in prey distribution.

Although basking sharks and minke whale are mobile, repeated disturbance of key feeding areas may reduce feeding efficiency and habitat quality over time.

Basking sharks and minke whales are an iconic species of Scotland's west coast and are a significant component of marine biodiversity and wildlife tourism. Their presence reflects the productivity and health of the wider marine ecosystem.

Because they mature slowly, reproduce infrequently and have low population growth rates, basking sharks are particularly vulnerable to additional pressures. Even relatively small increases in mortality or displacement may have long-term consequences for the population.

The Environmental Impact Assessment should include:

- Robust multi-year baseline surveys of shark and whale distribution within and around the proposed development area.
- Multi-season assessments to determine the abundance and seasonal distribution of basking sharks and minke whales within and around the proposed development area.
- Underwater noise modelling.

The assessment should also consider cumulative impacts with other developments and evaluate whether the proposal could adversely affect important feeding habitat or movement corridors used by these protected species. Where scientific uncertainty remains, the precautionary principle should be applied.

Other marine species

Seals

Mull, Iona, Staff, the Treshnish Isles, Coll and Tiree contain important haul-out sites and breeding colonies for both grey and harbour seals. Both are protected under Scottish legislation and many haul-out sites receive additional protection. Individuals travel many kilometres between haul-out sites and in search of prey. The proposed developed falls within their foraging range and is likely to affect seal populations which are already in significant decline. The Scottish harbour seal population has declined 25% since 2021 (University of St Andrews).

Orca

The only two surviving member of the so called West Coast Community of killer whales are known as John Coe and Aquarius. They have acquired celebrity status due to the near extinction of their eco-type in Scottish waters. Both individuals have been repeatedly photographed around Mull, Staffa, the Treshnish Isles, Coll and Tiree and the wider Hebrides. This is an iconic species and given the small size of the population, even small changes in their environment could have disproportionately large conservation consequences.

The Environmental Impact Assessment should include:

- Detailed marine mammal surveys;
- Passive acoustic monitoring;
- Assessment of underwater noise and increased traffic
- Assessment of the ecological connectivity of the development areas and the sites detailed above as well as the wider Hebridean Sea.

The waters surrounding the proposed MachairWind development are used by a significant number of significant and protected species which are part of a connected marine ecosystem extending throughout the Inner Hebrides.

These species range widely beyond designated protected areas, meaning that the

absence of direct overlap with a protected area does not exclude the probability of significant ecological effects.

Given the recognised conservation importance of both birds, fish and marine mammals and the fragile habitat on which they depend, any assessment should adopt a precautionary approach and demonstrate beyond reasonable scientific doubt that the development will not adversely affect these species or the wider marine ecosystem on which they depend. Many of these species forage tens of kilometres offshore and may be displaced from feeding grounds or face increased collision risk from large offshore turbines.

The coastline also supports grey seals, common seals, bottlenose dolphins, minke whales, basking sharks, otters and migratory fish including Atlantic salmon and sea trout. These species depend upon healthy, connected marine ecosystems rather than isolated protected sites.

The Environmental Impact Assessment must therefore consider not only direct impacts but also cumulative effects with existing and proposed offshore wind developments, commercial shipping, fishing activity and climate-driven ecological change. Small individual impacts may combine to produce significant long-term effects on protected populations.

I am particularly concerned that the Habitats Regulations Assessment may underestimate ecological connectivity between the proposed wind farm and surrounding protected sites. Marine mammals and seabirds routinely travel well beyond designated boundaries, and impacts such as underwater noise, habitat displacement and altered prey availability cannot be dismissed simply because the proposed development is outside designated sites.

Under the Conservation (Natural Habitats, &c.) Regulations 1994, consent should only be granted where there is no reasonable scientific doubt that the integrity of European protected sites will not be adversely affected. Where uncertainty remains, the precautionary principle should apply.

Scotland’s west coast is recognised internationally for its exceptional marine biodiversity. Renewable energy development is essential in addressing climate change, but it must not be delivered at the expense of irreplaceable protected habitats and species that are already facing increasing environmental pressures.

The project would place huge turbines very close to the islands of Iona and Colonsay bringing industrialisation to a landscape noted for its wild untamed beauty. The development is likely to harm the cultural heritage of Iona and affect tourism to both islands and the wider area.

For these reasons, I respectfully request that consent for the MachairWind Offshore Wind Farm proposal be refused unless it can be conclusively demonstrated that there will be no adverse effect on nearby protected sites, their qualifying species and the wider ecological network upon which they depend. Thanks you for considering this objection.

Yours faithfully,

[Redacted]

Member of the Public 5010

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	MachairWind objection
Date:	29 July 2026 20:55:20

Dear MD.MarineRenewables

I write to formally object to the proposed development **MachairWind Offshore Wind Farm** (***Marine Directorate references 00012385 and 00012386, submitted on 25 June 2026)***.

I agree 100% with *the Iona Community Council's* objection to this development as well as supporting the objection from the *Iona Community*, of which I am an Associate member.

The objections below are based on my career as an ecologist and on the observations made on environmental grounds by the Iona Community Council.

1. The documentation is not written in a helpful manner and in particular , despite searching extensively within the applicant's documentation I could find **no clear map** of the proposed 91-turbine proposal. Please rectify.

2a. I highlight the absence of the necessary associated large scale **infrastructure** to enable renewables to be distributed proportionately and quickly. It would seem that things have been done in a wrong order; indeed living in Orkney for 20 years enabled me to see at first hand how oil-related developments could be beneficial or destructive.

2b. And in order that MachairWind can receive that renewable energy what plans have they identified in terms of the infrastructure needed to transport that power to benefit distant locations and 'nations' that they need to reach?

3. How will this huge-scale proposal benefit Scotland? And note this quote below : *"The site was chosen by ScottishPower Renewables (SPR) from 20 sites identified because of **ease of development**"* That again is a financial decision

4. One feature that came clear recently was that Orkney (my original home) had been producing enormous amounts of wind and tidal renewable power; but the council had to put on hold its approval until there were sufficient means to move that power south into the Scottish grid. Only now in 2026 (50 years since the year that 'the oil came' to the islands) are **enormous civil engineering works** taking place from which it is hard to see that the works will 'leaving nothing but footprints'.

5a. Another key term is **financial benefit**. What nations and regions will benefit from the renewable energy power produced by MachairWind? ie where will the power be finally used?

5b. What companies will **benefit financially** from the MachairWind development near Iona?

6. I share with many other people the desirability of having renewable energy provision offshore, but if this has a hint of **political decision-making** then to object to it, in a very acute and immediate and strong manner, is urgent.

POSTSCRIPT - *re. Portavadie 1975*

A. My family was personally very much affected by a similar decision at Portavadie near the Kyles of Bute in 1975. Because North Sea oil seemed to be a lucrative win for UK government purposes the then PM Harold Wilson steamrollered planning permission to Sea Platform Constructors for the building of (concrete) oil rig platforms at the above location, despite there being at an exceedingly beautiful area.

B. This was a very ill-thought political proposal and therefore it was no surprise when 10 years later, SPC having received no orders from that newly built construction yard, the whole project was abandoned as per the original planning consent.

C. The development had included an enormous dry dock area blasted out of the peaceful, agricultural and pastoral environment and is hard to imagine how SPC proposed to return* it to its original topography – that being part of the original application approval. They did not* return the site to anything like its original.

D. The lesson to be learned from that fateful decision is that the general public (and particularly those keenly affected by Machairwind) need **far more time to object**.

CONCLUSION

The acutely-timed consultation (just 10 days) hints that the Scottish Government will move through this whole project without giving it the attention it needs .

Please confirm that there will be other stages in the application process that enable objectors to further examine the application.

In supporting an Iona Community / Iona residents' objection I demand that there are further stages in this application's progress and development that need to be approved at each relevant point. In other words this step must not be the only / final point where the application can be re-evaluated.

I look forward to your reply.

Yours faithfully

[Redacted]

Member of the Public 5011

Marine Directorate
Scottish Government

Re: MachairWind

This project will despoil one of the last scenic parts of Britain that looks just the way it did when St. Columba sailed there in the sixth century and for millennia back to the last ice age. Does the Government have to designate this uniquely Scottish legacy as a National Marine Park before everyone understands that it must just be left alone?

[Redacted]

Member of the Public 5012

[Redacted]

Objection to the MachairWind project (Scotwind W1)

I seek to register an objection to the proposed wind farm situated near the Island of Iona.

As a trained physicist, albeit retired, I am well aware of the need to take urgent action to mitigate the effects of climate heating. A primary way of approaching this is to increase the use of renewable means of generating electrical energy. I am therefore in general supportive of windfarms, both on and off shore. However, siting of these has to be sensitive to the needs of communities where they are built. That there is insufficient weight given to such sensitivities, aesthetic and spiritual, forms the basis of my objection.

Unlike some people, I do feel that wind turbines and windfarms have a certain visual attractiveness. I suppose that this is some of the engineer in me which finds their design reasonably elegant and certainly the form follows the nature of the beast. For example, I frequently see the Liverpool Bay windfarm from Llandudno in North Wales and this does not, for me, diminish the attractiveness of the seaview from the promenade. However, that is seen from the context of a busy seaside resort.

The simulated cgi views of MachairWind over the sea from Iona suggest to me that there will be considerable intrusiveness and disturbance of the tranquillity as experienced at present. Especially at night, the hazard warning lights on the pylons will stand out, intruding significantly on the current “dark sky” perspective.

I will freely admit that my opinion is based largely on emotion and sentiment. Over the past 30 years I have spent time most years seeking the tranquillity and calmness that is engendered by the atmosphere of spirituality built up over the centuries in a place where, as Rev George Macleod noted, the barrier between heaven and earth is thinner than a cigarette paper.

Another thing that disturbs me about this proposal is that it is tripartite but only approval of one part of the project is sought here, albeit the most expensive part. If it is approved, “sunk cost” arguments will no doubt be employed to wave through the undersea cable link and landing station without adequate scrutiny.

I trust that the Scottish Ministers will require MachairWind to resite this wind farm to a much less sensitive site.

Perhaps we could echo W. H. Davies

What is this life if, full of care,
We have no time to stand and stare?

No time to see, in broad daylight,
Streams full of stars, like skies at night

Yours sincerely
[Redacted]

[Redacted]

email: [Redacted]